

Planning Report

Proposed SHD

**Lands at The Grange,
Brewery Road/Stillorgan Road,
Stillorgan, Blackrock,
Co. Dublin**

On behalf of

**KW PRS ICAV acting for and on behalf of
its sub-fund KW PRS Fund 10**

September 2019



Planning & Development Consultants

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1 KENNEDY WILSON - THE APPLICANT

Kennedy Wilson is a long-term investor, developer and operator of Private Rental Sector (PRS) accommodation. The company owns and operates over 2,400 apartments in Ireland with a further 1,500 units in design or under construction. Their award-winning developments have been identified as exemplar projects by local authorities, government agencies and internationally accredited industry groups across design, build quality, resident amenities, public realm and placemaking. Some examples include Clancy Quay, Capital Dock and Vantage Sandyford.

Kennedy Wilson is recognised as setting the standard in terms of development and operation of larger scale PRS schemes in Ireland, centred around the provision of high quality accommodation, onsite resident amenities and dedicated professional management. As a long-term owner and operator of over 28,000 rental home units worldwide Kennedy Wilson understands the importance of ensuring future resident experience is factored into the design process from inception. This is underpinned by our focus on sustainability, functionality, operational considerations and technological innovation. The objective is to create vibrant communities and neighbourhoods where residents will want to live.

Kennedy Wilson are recognised as setting a high standard for Build to Rent projects in Ireland by providing a high quality accommodation officer, residential amenities and professional management with the 'Vantage' development in Sandyford being a typical example. Images are included below.



Figure 1 – The Vantage Sandyford



Figure 2 - The Vantage Sandyford



Figure 3 - Tenant Amenity Space Lounge Areas



Figure 4 - Tenant Amenity Space Gym Area



Figure 5 - Tenant Amenity Space Games Room



Figure 6 - Tenant Amenity Space Cinema Room

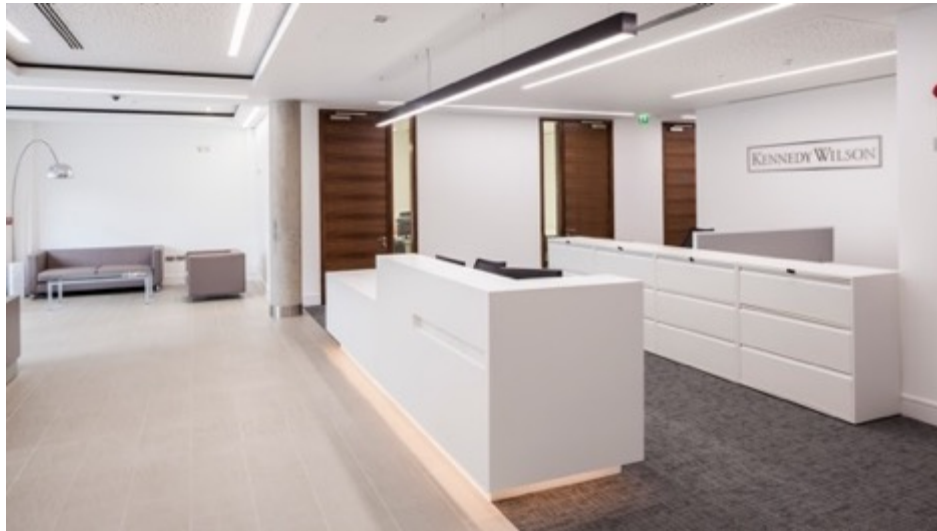


Figure 7 - Management Suite



Figure 8 - Living Space - Expansive Views



Figure 9 - Terraces with Expansive Views



2 EXECUTIVE SUMMARY

We, Brock McClure Planning & Development Consultants, 63 York Road, Dún Laoghaire, Co. Dublin, have prepared this Planning Report on behalf of **KW PRS ICAV acting for and on behalf of its sub-fund KW PRS Fund 10, 94 St. Stephen's Green, Dublin 2, D02 FD40** for a proposed Strategic Housing Development (SHD) relating to a Build to Rent (BTR) residential development of 287 residential units, a crèche facility and residential tenant amenity space, all at site of c. 1.8 ha, on lands at **The Grange, Brewery Road/Stillorgan Road, Stillorgan, Blackrock, Co. Dublin.**

A summary of the main points of this report are set out below:

The Site

- The application site extends to c.1.8 ha and is strategically located at the junction of Brewery Road (N31) and the N11. The site contains 'The Lodge', former 'Oaktree Business Centre', 'The Grange Marketing Suite' and 'Nos. 2 and 3 The Grange Cottages'.
- The applicant also controls 275 residential units within the existing Grange development which contains 506 units overall.
- The subject site has excellent connectivity to public transport and major areas of employment.
 - Bus - The overall site is located adjacent to the N11 Bus Priority Route / Quality Bus Corridor. Distances to the nearest bus stops are less than 5mins walk. Travel time to St. Stephen's Green by bus is 25 mins.
 - Luas - The Sandyford LUAS stop is a 14min walk from the proposed development. This stop is on the Green Luas line and journey time to St. Stephen's Green is 26 minutes.
 - Employment Areas - The site is located within 2km of Sandyford Business Park, Central Park and South County Business Park. The site is also within 1km of Stillorgan Village Centre.
- A key difference between historic planning applications and the current subject proposal relates to the extent of the application site. The current application site includes the 'Oaktree Business Centre' on Brewery Road, which was not included in a previous 2007 planning application. An increased site area and inclusion of additional properties has enabled a more comprehensive and integrated approach to development along Brewery Road, which greatly benefits the site and current proposal for consideration.
- The lands within the applicant's control do not extend to include No. 1 The Grange Cottage, which restricts delivery of a fully consolidated approach to development along the N11 frontage. This current application therefore relates to a Phase 1 development on lands that can deliver critically required residential units. OMP Architects are the appointed design architects and have developed a phased Masterplan approach to provide for an indicative future Phase 2 context for consideration by An Bord Pleanála, which is enclosed herewith. It is envisaged that this Phase 2 proposal will deliver c. 193 residential units. Accompanying documentation has referenced a potential phase 2 figure of 250 residential unit to allow for any uplift on figures.
- The Masterplan successfully integrates this new phase of development with the existing built fabric of The Grange. The approach has been to set the blocks around a central garden, which complements the existing scheme and delivers significant enhancements to the public realm. This scheme also proposes a new crèche and a pedestrian link to the adjacent parklands, two elements that are critically lacking in the existing development at The Grange.



The Proposal

- As part of this application, there are 3 no. buildings proposed for demolition (total GFA c. 1,398 sq m). These buildings include 'The Lodge', 'The Grange Select Marketing Suite' and 'Oak Tree Business Centre'.
- A total of 287 residential units are proposed in 4 Blocks (Blocks H, J, M & N). Residential Mix is as follows:
 - 19 x Studio Units (6.6%)
 - 125 x 1 Bedroom Units (43.6%)
 - 143 x 2 Bedroom Units (49.8%)
- A total of 146 of the 287 units proposed have the benefit of dual aspect equating to 50.9% of the units.
- Blocks H also contain a Tenant Amenity Space of 961.5 sq m
- A crèche facility of 658 sq m is proposed in the form of Block P to service the existing Grange development, the current proposal and any indicative future phase of development.
- New Block Q provides for a substation of 96.5 sq m.
- Heights of 1-11 storeys are proposed and these heights are considered appropriate to the site and surrounding context and are framed by existing developments at The Grange and Beechwood.
- Residential Density of 159.4 units per ha are proposed based on a site area of c. 1.8 ha and the provision of 287 units.
- A total of 100 car parking spaces are proposed in a new basement as part of the current planning application (84 at surface at basement level and 16 at surface level). The new basement is located under Blocks H, J and M. The 84 spaces at basement level are proposed to service the residential element of the proposal and the 16 surface spaces proposed at surface level address crèche requirements (8 spaces) with an additional 8 residential visitor car parking spaces at this location.

We can also confirm that there are an additional 100 spaces available to the proposed development in the existing basement of the Grange. All considered, a total of 200 spaces are available to the new development (100 new car parking spaces and 100 existing spaces).

Residential car parking ratios are 0.32 spaces based on the 92 new residential spaces (84 at basement level and 8 at surface level) level or 0.66 spaces based on the proposed 92 new residential spaces and additional 100 spaces available to the development (192 spaces overall). There are 8 dedicated creche parking spaces which bring the overall total car parking proposed to 100 or 200 when the existing residential spaces in the Grange are considered.

- A total 596 bicycle spaces (518 at basement level and 78 at surface level) and 5 motorcycle spaces are proposed (all at basement level).
- A total of 10,465 sq m of public open space is proposed within the development. This provision is over and above requirements of the relevant Development Plan and the Apartment Guidelines.
- A total of 29 Part V residential units (11 studio units and 18 x 2 bed units) are indicatively proposed within the scheme as part of a proposed leasing arrangement as provided for under the 'Apartment Guidelines of 2018'.



Planning History

- There is a total of 506 permitted residential units in the existing Grange Development. A summary of the relevant permissions pertaining to these permitted residential units is set out further in Section 7.1. of this report. Kennedy Wilson have control over 275 of these permitted units.
- There is 1 significant planning application pertaining to the subject site. Notably, Reg. Ref. D07A/1771 & PLO6D.228499, which provided for 87 no. residential units, a leisure centre (2,157 sq m) and 139 no. car parking spaces. The proposal took the form of 2 residential blocks (H1 - 5 storey over basement level and H2 - 9 storey over basement level).

Planning permission was refused for the development for 4 reasons:

- Scale and Height of the proposal and the impact on the adjoining properties and views from Brewery Road.
 - Inappropriate mix of uses and excessive residential density.
 - Unacceptable levels of overlooking.
 - Inadequate provision of useable public open space.
 - Failure to demonstrate that the crèche facility could accommodate the proposal.
- The current proposal has successfully addressed all previous reasons for refusal and we note the following key points in this regard:

- It is important to set out that since the previous 2007 decision was made, the planning policy context relevant to the assessment of the visual impact of development on the built environment has changed considerably. Notably, the introduction of a Building Height Strategy in *The Dun Laoghaire-Rathdown Development Plan 2016-2022*, which, at 'Section 4.8.1: Upward Modifiers' provides that consideration may be given to allowing for height over and above the benchmark heights for development, which would contribute to higher densities within 500 m of the N11.

Furthermore, we note the recent publication of *The Urban Development and Building Heights Guidelines for Planning Authorities* (December 2018), which now requires the competent authority to drive general increases in building height.

This is a key factor for consideration in review of how the current proposal compares to the previous refusal on site.

- The current application provides for the consolidation of the Brewery Road frontage, a critical consideration in the assessment of the matter of visual impact and height along Brewery Road. An increased site area is a critical factor and specifically the inclusion of Oaktree Business Centre in the site area. The design has considered the visual impact and relationship at this location in detail and we are confident that the inclusion of the additional lands (Oaktree Business Centre) and the delivery of a more integrated public realm successfully addresses all matters historically set out by An Bord Pleanála as reasons for refusal.

We note specifically that significant evolution of the design has taken place since the initial pre-planning stages of this development and the applicant has collaboratively engaged with Dun Laoghaire Rathdown County Council to deliver a quality interface at Brewery Road specifically. Key improvements include additional set-backs, improved landscape proposals and the delivery of an appropriate building height and line at this location. Improved universal access has also been a focal point of design with reductions to podium level delivered within the scheme.

The buildings have been sited to address Brewery Road providing animation and access to the heart of the scheme. The buildings are designed as a series of pavilions of varying height, with the breaks in volume indicating points of entry. Permeability



is now a core concept of design and the scheme is highly accessible throughout. We refer to material enclosed from O'Mahony Pike Architects setting out the permeability of the scheme.

- Particular care has also been given in design to the relationship of the proposed development to the existing Grange Cottages and the views of the development from Brewery Road. Notably, development closest to the boundary with No.1 The Grange Cottages is no more than 4 storeys in height and has generous separation distances, with no development closer than 24 m from the cottage. The internal layouts of the blocks are designed to avoid any undue overlooking, with living spaces and balconies orientated towards the central open space.

In addition, the design has purposefully delivered a significant area of public open space to the rear of the cottage, which ensures that existing levels of residential amenity are maintained for this property.

The two storey houses on the far side of Brewery Road (Lawnswood Park) are sited generally 44-68m from the proposed new buildings. This is considered to be a significant distance in a suburban context and we note that the technical assessments in relation to visual impact, daylight and overshadowing do not indicate any negative impact on these existing dwellings.

We refer to the design statement and the ABP response document enclosed herewith from OMP architects for further detail on the residential amenity of these units.

- It is our view that the current scheme delivers on an appropriate mix of uses and one that should be considered on merit given the critical requirement for residential development in the Dublin area.
- The delivery of a central public area of open space and a quality landscape plan has been a key objective from the outset of design. We note specifically that public open space of 10,465 sq m of public open space is proposed at this location, which equates to c. 57.6% of the site area. This provision is over and above the 10% minimum requirement of the Dun Laoghaire Rathdown Development Plan and is also over and above the communal open space requirements of the Apartment Guidelines (2018). The extent of open space provision is set out clearly on page 40 of the O'Mahony Pike Design Statement enclosed herewith.
- The Bord will note that a new crèche facility of c. 658 sq m is delivered in Block P of the current proposal. This proposal has the capacity to cater for the existing Grange Development, the current phase 1 proposal and any potential future phase 2 proposal. Documentation enclosed herewith and specifically the Community Infrastructure Statement clearly sets out the detail of this capacity assessment.

Planning Context

- The subject site is a prime underutilised suburban site located proximate to key public transport nodes such as the N11 bus priority route and the Green Luas line. The site is therefore optimally located to provide for a higher residential density and additional height in compliance with the current national policy mandate.
- The subject site has the potential to deliver a significant quantum of development in the heart of Stillorgan and Blackrock areas. The proposal is reflective of existing patterns of development, notably at the existing Grange development, and of emerging residential developments along the N11.
- The applicant has extensive experience in the operation of high quality residential rental schemes and delivers exceptional standards of residential amenity. Based on this experience the residential amenities proposed in this scheme will be a notable benefit to future occupants.



- The proposal is in accordance with the relevant statutory documents and there is an appropriate planning context for this proposal. The proposed use is acceptable in principle at this site and under this zoning. Furthermore, proposed heights, densities and public open space provision for this scheme is well founded in the context of the provisions of the Dun Laoghaire Rathdown County Development Plan 2016-2022 and National planning policy.
- The residential units proposed are of exceptional quality, with appropriate floor areas, private open space provisions, connections to public transport and car parking facilities. Careful attention has been given to permeability with the surrounding context and to the protection of existing levels of residential amenity afforded to No. 1 The Grange Cottage and to properties along Brewery Road.



3 INTRODUCTION

We, Brock McClure Planning & Development Consultants, 63 York Road, Dún Laoghaire, Co. Dublin, have prepared this Planning Report on behalf of **KW PRS ICAV acting for and on behalf of its sub-fund KW PRS Fund 10, 94 St. Stephen's Green, Dublin 2, D02 FD40** for a proposed Strategic Housing Development (SHD) relating to a Build to Rent (BTR) residential development of 287 residential units, a crèche facility and residential tenant amenity space, all at site of c. 1.8 ha, on lands at **The Grange, Brewery Road/Stillorgan Road, Stillorgan, Blackrock, Co. Dublin.**

This planning report is intended to specify the rationale behind the subject proposal; to identify compliance with relevant statutory documentation; and to provide a detailed description of the proposal for the benefit of An Bord Pleanála.

This application, proposing in excess of 100 residential units, is eligible for consideration under the provisions of the Planning and Development (Housing) and Residential Tenancies Act 2016, as amended and the Planning and Development Regulations 2001, as amended.

This report is prepared as an accompanying report for the subject proposal and should be read in conjunction with all plans and particulars submitted as part of the overall planning application.

3.1 Context for the lodgement of this Planning Application

This strategic housing development planning application request is lodged in accordance with Part 2 Section 4 (1) of the Planning & Development (Housing) and Residential Tenancies Act 2016, which sets out the following requirements:

(1) Subject to subsection (4), during the specified period and notwithstanding anything to the contrary contained in any other provision of the Planning and Development Acts 2000 to 2016—

(a) an application for permission for a strategic housing development shall—

(i) be made to the Board under this section and not to a planning authority, other than an application for permission, the purpose of which is as set out in section 34(3A) of the Act of 2000,

(ii) be so made only where section 6(7)(b) applies or, in the case that a request is made under section 7(1), when the Board has complied with the request pursuant to section 7(2),

(iii) be so made only where the applicant for permission has fulfilled the requirements set out in section 8,

(iv) be in such form and contain such information as is prescribed, and

(v) be accompanied by the appropriate fee,

and

(b) a copy of the application, shall be sent by the applicant to the planning authority or authorities in whose area or areas the proposed strategic housing development would be situated.

This planning application is lodged in compliance with the above requirements and particularly those set out in Section 8 of the Planning & Development (Housing) and Residential Tenancies Act 2016.

In addition, we confirm specifically that:

- **2 hard copies and 3 digital copies of all material is now submitted for review by An Bord Pleanála.**
- **6 hard copies and 1 digital copy of all material has been issued to the Planning Authority of Dun Laoghaire Rathdown County Council in advance of this submission.**
- **1 digital copy has been issued to each of the 5 Prescribed Bodies identified by An Bord Pleanála in the formal opinion issued under ABP-304147-18.**



3.2 National Policy Mandate

This planning application has been prepared in the context of recent updates to national planning policy. We trust An Bord Pleanála will have regard to these policy and guidance documents in assessment of this proposal and specifically the policy mandate set out in *'Project Ireland 2040: National Planning Framework'*; the *'Regional Social and Economic Strategy for the Eastern and Midland Regional Assembly 2019-2031'*; the *'Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities (2018)'*; and *'Urban Development and Building Heights: Guidelines for Planning Authorities (2018)'*.

These documents are key national policy and guidance documents that seek the expedient delivery of quality urban residential development of an appropriate height and density at suitable locations.

We note specifically that the subject site has the potential to deliver 287 residential homes on zoned, serviced land at a highly accessible location at Brewery Road in Stillorgan. This in turn can positively contribute towards meeting the severe deficit in housing supply identified in national policy.

There is a clear mandate for expedient delivery of high quality residential development and we trust that An Bord Pleanála will give favourable consideration to the principle of the proposal in this light.



4 DESIGN EVOLUTION

For clarity, we wish to set out the key points associated with the evolution of the design currently before the An Bord Pleanála.

From the outset, we wish to highlight that the design of the proposal and specifically the interface at Brewery Road has evolved significantly from the pre-planning stage of developments. Initial concerns raised by the Planning Authority have been comprehensively reviewed and the revised treatment along Brewery Road has addressed all points raised. The proposal, as currently submitted delivers a new public realm, which provides for legibility and a high - quality suburban streetscape. We submit that the proposal now being submitted greatly enhances a sense of place along the Brewery Road frontage. The new environment is pedestrian friendly, easily navigated and fully permeable. The buildings address the street and have an active edge, which is a notable improvement on the current environment.

- Increased Set Back from Brewery Road
- Improved Level Changes to the Central Open Space Area
- Improved Connectivity to Brewery Road
- Improved Open Space between proposed Block M and existing Block G
- Improved Connection to existing public realm in the existing Grange Development
- Improved Amenity for No. 1 The Grange Cottage

These key changes are set out in full detail in the enclosed material from O'Mahony Pike Architects and specifically the documents entitled 'Design Response to An Bord Pleanála's Notice of Pre-Application Consultation Opinion' and the relevant 'Design Statement'.



5 THE DESIGN TEAM

Our client has appointed an experienced design team to prepare this residential pre-planning application, which will be lodged under the Strategic Housing Development process to An Bord Pleanála. The immediate design team comprises:

- Kennedy Wilson - Applicant
- Lafferty Project Management - Project Managers
- O'Mahony Pike - Design Architects
- Brock McClure - Planning Consultants
- Waterman Moylan - Consulting Engineers
- Mitchell & Associates - Landscape Architects
- The Tree File - Arboricultural Consultants
- Scott Cawley - Ecologists
- ARC - Architectural Consultants
- Irish Archaeological Consultancy Ltd - Archaeological and Cultural Heritage
- O'Connor Sutton Cronin - Energy and Electrical Engineers
- Jeremy Gardner Associates - Fire Safety Consultants
- KSN - Construction Consultants
- Modelworks - Visual Consultants
- BFluid - Microclimate Consultants
- Aramark Property Consultants
- Awn Consulting





6 THE SITE

The subject site consists of lands associated with an existing development known as The Grange, located bounding the N11 and Brewery Road (N31) in Stillorgan, Co. Dublin. The Grange is a residential development comprising 506 units and the current development site is located to the north west of the existing development.

The application site consists of a total site area of c.1.8 ha and is outlined below for context purposes.

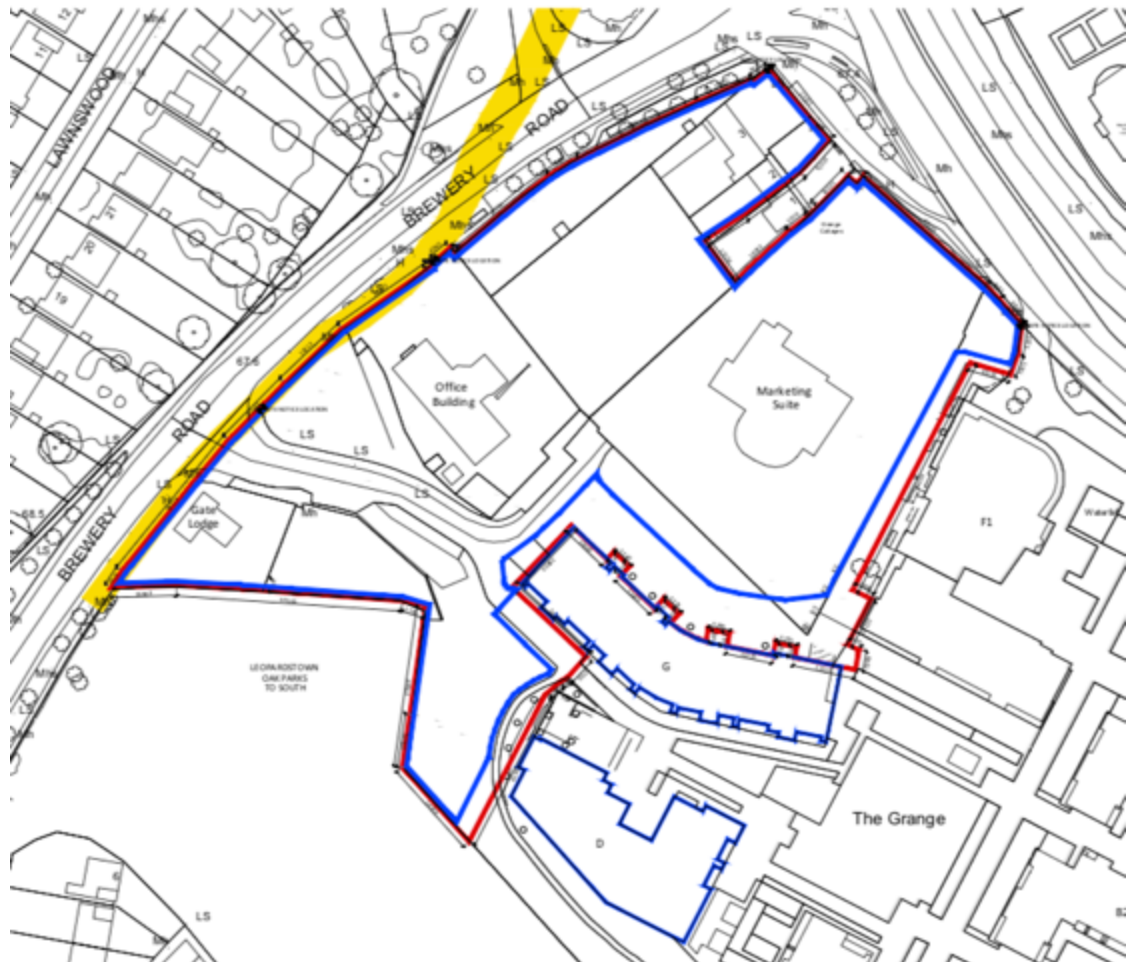


Figure 10 - Site Boundary

As set out above, the applicant controls the majority of the remaining lands at The Grange, with the exception of No. 1 The Grange Cottages. We draw the Bord's attention to the fact that the application site includes the Oaktree Business Centre on Brewery Road, which is a parcel of land that was not part of historic planning applications to complete The Grange. The inclusion of this site in the subject proposal greatly benefits the design approach to Brewery Road, as detailed by OMP Architects.

6.1 Buildings on Site

Buildings on site comprise the following:

- Nos 2 + 3 The Grange Cottages (which are retained as part of this application)
- The Lodge at Brewery Road Access Point (which is proposed for demolition a part of this application)
- The Grange Select Marketing Suite and associated buildings along the N11 (which is proposed for demolition as part of this application)



- Office Building known as Oak Tree Business Centre (which is proposed for demolition as part of this application)

The 3 buildings proposed for demolition in this case relates to a floor area of c.1,398 sq m.

The Lodge building is a vacant 2 storey residential unit, constructed under the previous permissions for development of The Grange:



Figure 11 - View of The Lodge Building - to be demolished

Oaktree Business Centre is a vacant two storey commercial building, dating from the 1980s. It is at the end of its functional life and is not of any particular architectural merit.



Figure 12 - View of Oaktree Business Centre - to be demolished



Figure 13 - Aerial View of Oaktree Business Centre and vacant lands

The Marketing Suite is a single storey building constructed for temporary purposes.



Figure 14 – Marketing Suite

6.2 Context for No. 1 The Grange Cottage

The applicant's land ownership extends around No.1 Grange Cottages, which is occupied and in separate ownership. In this regard, the protection of established residential amenity has been a primary consideration for the design team in preparing the subject scheme.

Evidently, our client does not control the entirety of remaining lands to provide consolidated development to the N11 frontage. The third party ownership of No. 1 The Grange Cottage, restricts the delivery of a fully consolidated approach to development along the N11 frontage.



This current application therefore relates to a Phase 1 development on lands that can deliver critically required residential units. OMP Architects have developed a phased Masterplan approach to provide an indicative future context for consideration by An Bord Pleanála, which is enclosed herewith. There has been a carefully considered design approach to development to ensure that the subject application can be delivered without compromising existing amenity or the future potential for development addressing the N11.

It is envisaged that this Phase 2 proposal will deliver c. 193 residential units. Accompanying documentation has referenced a potential phase 2 figure of 250 residential unit to allow for any uplift on figures.

6.3 Context for Nos. 2 & 3 The Grange Cottages

Whilst the current application site includes Nos. 2 and 3 The Grange Cottages, the current proposal does not propose any substantial works to these units. We note that landscape proposals only are delivered to improve the appearance of these units.

No works are proposed to the structure or layout of these units.

6.4 Surrounding Context

The site is just North of the existing Grange Development. To the east of the site is the N11. The western side of the site is bound by Brewery road (N31). Finally, to the South there an area of public open space.

The subject site has excellent connectivity to public transport and major areas of employment. It is within 2km of Sandyford Business Park, Central Park and South County Business Park. The site is also within 1km of Stillorgan Village Centre and well serviced by the Quality Bus Corridor along the N11 and ancillary bus routes along Brewery road. The following accessibility to public transport is identified:

- Bus - The overall site is located adjacent to the N11 Bus Priority Route / Quality Bus Corridor. Distances to the nearest bus stops are less than 5mins walk. Travel time to St. Stephen's Green by bus is 25 mins.
- Luas - The Sandyford LUAS stop is a 14min walk from the proposed development. This stop is on the Green Luas line and journey time to St. Stephen's Green is 26 minutes.
- Employment Areas - The site is located within 2km of Sandyford Business Park, Central Park and South County Business Park. The site is also within 1km of Stillorgan Village Centre.



7 PLANNING HISTORY

A brief synopsis of the planning history pertaining to the overall Grange Development and the site subject of this pre-planning submission is set out below.

7.1 Permitted Grange Development

For the purposes of clarity, the applicant has identified the following summary table of relevant planning register references, which identify the permitted element of the Grange Development.

| Block | Constructed under Planning Reference | Units Permitted | Total Units Permitted |
|--|---|-------------------------------|-----------------------|
| A - Quartz | Reg. Ref. D03A/0750 & PL06D.206308 | 38 | 38 |
| B1 - Coral | Reg. Ref. D03A/0750 & PL06D.206308 Reg. Ref. D05A/0831 & PL06D.214057 | 43 +6 (49) | 49 |
| B2 - Abalone | Reg. Ref. D03A/0750 & PL06D.206308 Reg. Ref. D05A/0831 & PL06D.214057 | 43 +6 (49) | 49 |
| B3 - Amber | Reg. Ref. D03A/0750 & PL06D.206308 Reg. Ref. D05A/0831 & PL06D.214057 | 43 +6 (49) | 49 |
| C - Jasper | Reg. Ref. D03A/0750 & PL06D.206308 D05A/1689 | 29 +4 (33) | 33 |
| D - Emerald | Reg. Ref. D03A/0750 & PL06D.206308 D14A/0015 D15A/0521 | 51 +1 (52) +2 (54) | 54 |
| E - Onyx | Reg. Ref. D03A/0750 & PL06D.206308 Reg. Ref. D05A/1016 & PL06D.214863 | 54 -11 (43) | 43 |
| F2 - Sapphire | Reg. Ref. D03A/0750 & PL06D.206308 | 70 | 70 |
| G - Jade | Reg. Ref. D03A/0750 & PL06D.206308 Reg. Ref. D06A/0073 & PL06D.217060 D06A/0073/E | 107 (+13) 120 (+13) 120 | 120 |
| Gate Lodge | D06A/1570 | 1 | 1 |
| 506 Units | | | |
| Permitted Development Known as 'The Grange' | | | |

Figure 15 - Permitted Development at The Grange and Relevant Register References

We note that there are additional planning register references pertaining to the overall development, but those outlined above are considered relevant in the context of the built element on site.



7.2 Subject Site

We can confirm that there is 1 recent application of relevance to the site subject of the current residential proposal, which is further detailed below. The outcome of the planning process in 2007 has directly informed the design team on the key issues to be addressed in the current proposal.

Reg. Ref. D07A/1771 & PL06D.228499

On **21 December 2007**, a planning application was lodged for development generally comprising 87 no. residential units, a leisure centre (2,157 sq m) and 139 no. car parking spaces.

The proposal took the form of 2 residential blocks:

- H1 - 5 storey over basement level
- H2 - 9 storey over basement level

The extent of the site layout is set out below.

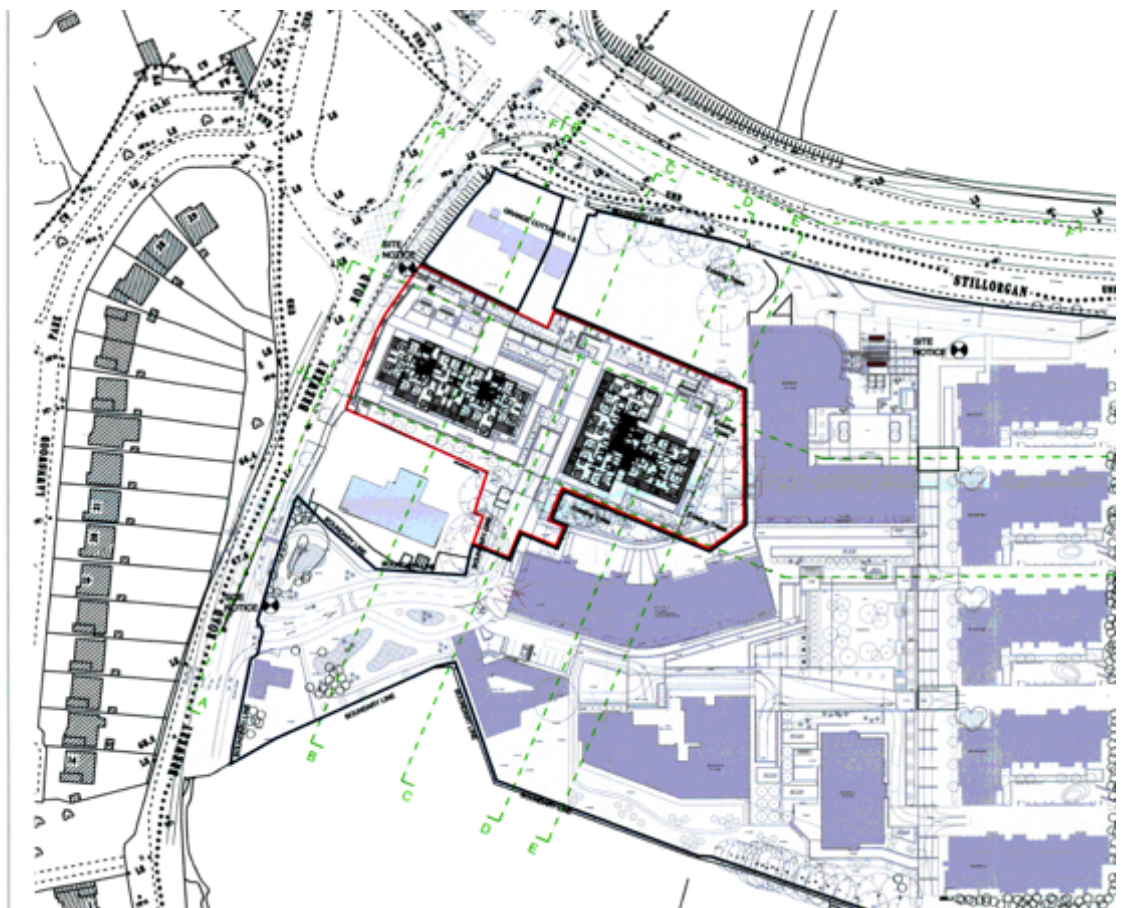


Figure 16 - Overall Site Layout

Planning Authority Decision

The Planning Authority refused permission for the proposal on **28 February 2008** for the following reasons:

“1. Having regard to the design, height, scale, and layout of the proposed development in close proximity to site boundaries and adjoining 1-2 storey buildings, it is considered that the proposed development would be visually obtrusive, particularly when viewed from Brewery Road and travelling south along the N11. It is considered that the proposed development is excessive and would constitute overdevelopment of the site. The proposed development would seriously injure



the amenities, and depreciate the value, of property in the vicinity and would therefore be contrary to the proper planning and sustainable development of the area.

2. It is considered that the significant intensification of, and the change in use of the site together with the cumulative increase in floor area and residential density, when taken in conjunction with the parent permission and subsequent amendments would unacceptably erode the permitted mix of use within the overall scheme know as 'The Grange'. The proposed development would result in excessive residential density, would result in an unacceptable mix of accommodation type, set a poor precedent in the area and would be contrary to policy RES7: 'Housing Mix' of the County Development Plan 2004-2010. The proposed development would be contrary to the proper planning and sustainable development of the area.

3. Having regard to the height, scale, and layout, particularly the limited separation distance of 19.395m between proposed block H1 and H2, the proposed development would result a substandard quality of private amenity space due to overlooking and block H2 would have an overbearing impact on Block H1. It is considered that the development would fail to provide an adequate standard of residential amenity for its future occupants and would fail to meet minimum standards of section 5.5.4: 'Apartment Development', of the County Development Plan 2004-2010. The proposed development would therefore be contrary to the proper planning and sustainable development of the area.

4. Having regard to the proposed increase in residential units and the failure to provide additional public open space or additional childcare facilities, to serve the proposed residential development or overall scheme, the proposed development would fail to meet the requirements of policy RES17: 'Childcare' and section 5.5.4: 'Apartment Development' of the County Development Plan 2004-2010. The proposed development would therefore be contrary to the proper planning and sustainable development of the area.”

An Bord Pleanála Stage

The proposal was the subject of a first party appeal against the decision issued by Dun Laoghaire Rathdown to An Bord Pleanála.

Revised plans were submitted at Appeal Stage and the following amendments were noted:

- **The height of Block H2 was reduced from 9 storeys to 7 storeys.**
- **The number of apartments was reduced from 87 to 73 units (now 45 units contained in Block H2).**
- **The mix of unit types was amended to 10x3bed units, 57x2bed units and 6x1bed units.**
- **Modifications to Block H1 to reduce overlooking.**

The appeal was lodged on 25 March 2008 and a decision was issued to refuse permission for the proposal on 28 October 2008:

“1. Having regard to the scale and height of buildings adjacent to the site, it is considered that by reason of height, scale and massing, the proposed development fails to respond to the pattern of development in this part of the overall site, would have an overbearing impact on the adjoining property and would constitute an overly obtrusive and incongruous feature in the area, in particular with regard to the view from Brewery Road The proposed development would, therefore, seriously injure the amenities of the area and of property in the vicinity and would be contrary to the proper planning and sustainable development of the area.

2. It is considered that the change of use of the site, together with the cumulative increase in floor area and residential density, when taken in conjunction with the parent permission and subsequent amendments, would unacceptably further erode the original permitted mix of use within the overall scheme. The proposed development would result in excessive residential density, an unacceptable mix of accommodation types and would be contrary to the policy RES7 of the Dun Laoghaire-Rathdown County Development Plan 2004-2010. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.



3. Having regard to the separation distances recommended for apartment development in the Dun Laoghaire-Rathdown County Development Plan 2004-2010, and to the relationship of the proposed blocks to each other and to adjoining blocks in the scheme, it is considered that the proposal would result in an unacceptable level of overlooking between blocks which would detract from the quality of the private open space and would result in an overbearing relationship between adjoining blocks in the scheme. As such the proposal would constitute overdevelopment and would be contrary to the proper planning and sustainable development of the area.

4. Having regard to the increase in the number and size of the residential units being proposed, it is considered that the proposal is inadequate in the provision of quality useable public open space.

5. Having regard to the policy on childcare in the Dun Laoghaire-Rathdown County Development Plan, the applicants have not demonstrated that the existing crèche facility is capable of accommodating the increase in residential units proposed. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.”

The above decision has been considered in significant detail by the design team and has driven the direction of the design now submitted.

Older Permissions

- The Lodge forming part of the subject site was permitted as part of the overall Grange development under Reg. Ref. D06A/1570 as set in Section 7.1 above.
- There also exists a historic planning permission file for the Oaktree Business Centre. Our understanding is that permission was granted for this permission under Reg. Refs. TA 2143 (1981 parent permission file), WA 2546 (1982 alterations file) and 91A/0632 (1991 alterations file).
- There is no apparent permission for the marketing suite, which was constructed c. 2005. The current application seeks permission for demolition of this building as referenced above.

7.3 Statutory Notice Check

Section 17 of the Planning Application Form sets out a requirement to consider the following vis a vis the subject site:

Do any statutory notices (e.g. Fire Safety, Enforcement, Dangerous Buildings, Derelict Sites, Building Control etc.) apply to the site and/or any building thereon?

We note that there are no notices of immediate relevance to the subject site.

However, we can identify that the following detail has been retrieved for the overall Grange Development:

Fire Safety Certificate

- 058088 - Granted with conditions
- 058347 - Granted with conditions
- 068183 - Granted with conditions
- 068186 - Granted with conditions
- 06/8253 - Granted with conditions



- 07/8121 - Granted with conditions
- 07/8176 - Granted with conditions
- 08/8167 - Granted
- 12/8130/7D - Granted with conditions
- 14/8133/REV - Granted with conditions
- 15/8119/REV - Granted with conditions
- 18/8049/REG - Granted with conditions

Enforcement

ENF8805 - Requirement of Notice: That advertising material, signage and illuminations attached to the hoarding structure be removed.

ENF 14515 - Non-compliance with Condition 22 of planning permission Reg. Ref. D03A/0750, in that construction works are being carried out outside of conditioned working hours for development.

These permissions generally related to the permitted Grange development and not specifically to the subject site.

We understand that these enforcement files are now closed.

Dangerous Buildings

No records on site.

Derelict Site

No records on site.

Building Control

The following disability access certificates were identified:

- RDAC 004/2015 – Disability Access Certificate
- DAC 030/2015 - Disability Access Certificate

In addition to the above, we have been advised that there is in excess of 200 commencement notices for the site.

7.4 Addressing Adverse Planning History

The design team have been fully cognisant of the need to positively address the issues raised in a previous refusal of permission for development on lands including the subject site. Although the relevant planning decision dates back more than 10 years, it is considered important to ensure the key concerns are identified and addressed in the subject scheme.

A key difference to note is that the subject site includes much large development site and specifically the Oaktree Business Centre, which was not included in the 2007 scheme. The inclusion of this site



enables a more comprehensive approach to development along Brewery Road, which greatly benefits the subject proposal.

The design team has considered the key issues identified by the Planning Authority and An Bord Pleanála in assessment and incorporated a number of key objectives into the design of the current proposal before the Planning Authority.

The key areas of concern under the previous refusal can be summarised and responded to as follows:

- ***Design, Scale and Height of the proposal and the impact on the adjoining properties and views from Brewery Road.***

It is important to set out from the outset of this response that the policy context associated with building height and design has significantly evolved since the issue of this previous refusal for the site. Notably, the publication of the 'Building Height Guidelines' and 'The Apartment Guidelines' now frame the context for building height and apartment design and this is a key point of consideration in review of the current scheme and how it addresses the previous refusal.

Furthermore, the current application site now includes a much wider application site and specifically it includes the DCC office building or Oaktree Business Centre, which allows for a more integrated approach to development along Brewery Road.

Notwithstanding the above, a new streetscape is delivered along Brewery Road, which is considered a fitting and appropriate approach to development at this location. This proposal delivers a new public realm, which provides for legibility and a high - quality suburban streetscape.

We note specifically that significant evolution of the design has taken place since the initial pre-planning stages of this development and the applicant has collaboratively engaged with Dun Laoghaire Rathdown County Council to deliver a quality interface at Brewery Road specifically. Key improvements include additional set - backs, improved landscape proposals and delivery of an appropriate building height and line at this location. Improved universal access has also been a focal point of design.

This application now provides for consolidation of the Brewery Road frontage, a critical consideration in the assessment of the matter of visual impact and height along Brewery Road. The design has considered the visual impact and relationship at this location in detail and we are confident that the inclusion of additional lands and the delivery of a more integrated public realm addresses previous concerns as set out by the Bord.

The buildings have been sited to address the Road providing animation and access to the heart of the scheme. Permeability is a core concept and the scheme is highly accessible throughout. The buildings are designed as a series of pavilions of varying height, with the breaks in volume indicating points of entry. Two wide lower blocks frame the entrance road, redefined as the development's new front door.

The development will provide animation and supervision along Brewery Road in addition to full permeability with a series of punctuated access points into the scheme.

- ***Inappropriate mix of uses and excessive residential density.***

Again, we wish to reiterate that the policy context associated with residential mix, residential densities and unit types and has significantly evolved since the issue of the previous refusal for the site. Notably, the publication of the 'National Planning Framework', 'Building Height Guidelines' and 'The Apartment Guidelines' now frame the context for increased residential densities and height and new concepts of living including Build to Rent development. The current proposal is submitted in the context of this new policy and guidance. It is worth noting that the scheme has been designed to meet and exceed all relevant development standards in the new Guidelines. The proposal offers an excellent level of residential amenity from the



internal size and layout of residential units to the generous communal areas and additional amenity space. Furthermore, the scheme offers a new crèche facility and link to the adjacent parkland, which two elements critically lacking from The Grange currently.

We can confirm that 'residential', 'resident amenity' (ancillary to the residential use) and 'crèche' are land uses that are either permitted in principle or open to consideration under the 'A' zoning governing the site. It is our view that the current scheme delivers on an appropriate mix of uses that should be considered on merit by the relevant competent authorities.

In consideration of the principle of a solely residential scheme, it should be noted that 'residential' is considered the most appropriate land use for the subject site, given the proximity of the site to public transport at the N11 QBC and the Green Luas line in addition to the significant employment centres at Sandyford and Leopardstown. The site is also appropriately zoned for residential development and offers a significant Strategic Housing Development opportunity within the Stillorgan area, which will address the national policy mandate for residential at key urban and suburban locations.

The current proposal is a high - quality development with exceptional levels of residential amenity proposed for future occupants. The proposal is considered successful in its integration with the built element at the Grange and is framed by a detailed masterplan prepared by O'Mahony Pike. The current proposal shall significantly improve the overall Grange Campus without prejudicing the master plan vision for the site and delivers crucial residential amenities including a creche facility and residential amenity area of significant size.

This level of amenity, design ambition and overall quality is a significant advance on the proposal submitted in 2007.

We can confirm that a total of 287 units are proposed on a c.1.8 ha site, which provides for a residential density of 159.4 units per ha. This is considered appropriate and achievable at this location given the quality of the scheme proposed; the proximity of the site to public transport; and the protection of existing levels of residential amenity both within the scheme and at sensitive locations along Brewery Road and The Grange Cottages.

- **Unacceptable levels of overlooking.**

The design team has given careful attention to the scale and impact of any proposal vis - a - vis No. 1 The Grange Cottage and properties at Brewery Road. These are considered particularly sensitive locations and the design has from the outset aimed to deliver on an appropriate relationship at these locations.

Development closest to the boundary with No.1 Grange Cottages is no more than 4 storeys in height and generous separation distances have been provided, with no development closer than 24 m from the cottage. The internal layouts of the blocks are designed to avoid any undue overlooking, with living spaces and balconies orientated towards the central open space.

In addition, the design has purposefully delivered a significant area of public open space to the rear of the cottage, which ensures that existing levels of residential amenity are maintained for this property. Appropriate screening will be delivered between the proposed public open space area and the cottage to ensure that existing levels of residential amenity and privacy are maintained for the cottage.

The two storey houses on the far side of Brewery Road are sited generally 44 - 68m from the proposed new buildings. This is considered to be a significant separation distance in a suburban context and we note that the technical assessments in relation to visual impact, daylight and overshadowing do not indicate any negative impact on the existing dwellings in this regard.



Appropriate Separation Distances are delivered within the scheme. We can confirm that there are no instances of direct overlooking which have a separation distance of less than 22m within the development.

- ***Inadequate provision of private open space and useable public open space.***

As detailed on the enclosed material, public and private open space for Apartments shall comply with private and communal open space requirements set out in the Apartment Guidelines, that being 4 sq m for studios, 5 sq m for 1 beds and 7 sq m for 2 beds for both private and communal open space. The proposal also delivers over and above the minimum 10% public open space requirement as set out by the Dun Laoghaire Rathdown County Development Plan 2016-2022. Specifically public open space is delivered at 10,465 sq m and this provision equates to 57.6% of the overall site area.

With regard to private open space specifically, the design submitted has ensured that these spaces are entirely private in nature and are not overlooked by adjoining blocks. We refer the Planning Authority to the enclosed schedule of accommodation for further detail on proposals in this regard.

As set out above, the delivery of a central public area of open space and a quality landscape plan has been a key objective from the outset of design. We note that the current design delivers a central open space area and permeable landscape layout which will be accessible to all users.

- ***Failure to demonstrate that the crèche facility could accommodate the proposal.***

The Bord will note that a creche facility of c. 658 sq m is delivered in Block P of the current proposal. In progressing this proposal, the applicant was mindful that a crèche facility is a key requirement for the new build element of the overall Grange Development and is therefore a welcome component in delivery of a suitable mix of uses.

We note again at this point that the crèche facility proposed holds the capacity to address the demands of the existing Grange Development, the current proposal for 287 residential and potential future development.

Having regard to the above, we trust the Bord will acknowledge that the design team has successfully addressed the adverse planning history relative to the lands.



8 SECTION 247 - PRE-PLANNING

The evolution of the scheme and brief details on the level of engagement with the Planning Authority are summarised in brief below. We can also confirm that formal Section 247 meeting minutes (DLR Minutes) and any formal correspondence between the design team and various departments are enclosed with this pre-planning application (under separate cover) for information purposes.

8.1 Positive Collaboration

It should be highlighted that the strategic housing development now submitted is the product of a positive engagement process with the local Planning Authority. This process commenced in November 2018 with the lodgement of the pre-planning submission. A meeting was held with the Planning Authority on site, which enabled a thorough discussion of all relevant issues raised by the Planners and the Council's technical departments.

All matters raised by the Planning Authority have, where possible, been addressed throughout the documentation now submitted. It is important to note that where the applicant has deviated in terms of a difference of opinion with the Planning Authority, there is a clear rationale in support of the scheme in terms of its strong footing in national policy and ministerial guidelines.

It is our view that the engagement with the Planning Authority has ensured that the optimum design solution has been delivered. This has been a positive process and one which will benefit both the proposed development and the wider area in Stillorgan.

8.2 Planning Authority Pre-Planning Meeting 1

An initial pre-planning submission was lodged to the Planning Authority in November 2017. A formal pre-planning meeting was scheduled for 18 December 2018 to discuss the proposal in principle.

We have grouped the key points raised by the **Planning Department** by theme, with the design team responses as follows:

Procedural

- *There is a need to specify how this development is not a Build to Rent Model.*
 - We confirm the applicant is not seeking permission for a BTR Development as per SPPR 7 of the 2018 Apartment Guidelines. The development will be privately rented but follows a specific client brief, rather than the BTR policies of the Apartment Guidelines.
- *Applicant advised to contact the DLR waste team regarding waste management.*
 - AWN have been appointed to address matters of waste and an Operational Waste Management Plan has been prepared for consideration by the competent authorities at this time.
- *Photomontages are advised as part of the submission*
 - A full suite of Photomontage views have been prepared by Modelworks and are closed herewith.
- *An EIAR screening will be required.*
 - A full Environmental Impact Assessment Report has been prepared by Brock McClure.
- *Councils Housing department to be engaged with.*



- A proposal for compliance with Part V has been submitted with this application for consideration by the competent authorities in this case.
- *Applicant is required to submit a Construction Management Plan.*
 - Waterman Moylan Consulting Engineers have prepared an Outline Construction Management Plan for consideration by the competent authorities in this case.
- *Applicant is required to meet the 2018 Apartment Guidelines.*
 - OMP Architects have designed the scheme to meet all relevant standards contained in the 2018 Apartment Guidelines. Please refer to the enclosed Housing Quality Assessment for further details.

Design

- There is a 6m level change between Brewery road and the centre of the site.
 - The level changes have been incorporated into the development, with stepped links forming part of the landscape masterplan.
 - The proposal delivers a new streetscape for Brewery Road founded on strong principles of permeability, activity and urban grain. The buildings have been sited to address the Road providing animation and access to the heart of the scheme. The buildings are designed as a series of pavilions of varying height, with the breaks in volume indicating points of entry.
 - Two wide lower blocks frame the entrance road, which simultaneously provide for the development's new front door.
 - The development will provide animation and supervision along Brewery Road.
- *The possibility that Block H is bulky and there may be a need to reduce this.*
 - OMP Architects have reviewed the composition of Block H and refined its massing since the Pre Planning Meeting.
- *The possibility of creating access to the park on the adjacent site.*
 - An access point to the adjoining open space is included within the development as part of the overall landscape masterplan promoting connectivity and permeability.
- *The possibility to make some own door units to add variety to the development.*
 - The scheme does not lend itself to the inclusion of own door units, though entrance lobbies have been located to provide animation along the Brewery Road streetscape.
- *Concern for separation distance between Blocks H and G.*
 - We confirm that a separation distance of 22m is provided between Blocks H and G. Separation distances have also been carefully articulated within the scheme itself to ensure all minimum distances are met or exceeded, and the privacy of private open space areas are protected. Living rooms windows are at a minimum of 22m from each other.
 - Units are oriented to prevent overlooking between neighbouring blocks within and between the proposed and existing developments.
- *Concern over the extent of the covered amenity area and consider an option to reduce this.*
 - A revised design has been prepared by O'Mahony Pike Architects and is submitted herewith. We note also that the open space amenity area has also been tested in terms of overshadowing and access to sunlight. The enclosed Daylight and Sunlight Analysis from ARC Consultants confirms that this area is in receipt/has access to sufficient levels of sunlight.



- *Concern with permeability of the site and need for platform lifts.*
 - The connectivity and permeability within the site are maximised by the use of strong pedestrian links from the site boundary and with the existing Grange development. Stepped links to the podium are provided from the Brewery Road and N11. A new spine is created from the Entrance with Brewery Road creating a visual and physical link with the existing open space. An additional bridged link is created between the existing and new development. Designated routes for disabled access will be incorporated within the overall path network site wide.

Car Parking

- *The proposal is short car parking spaces as per DLR requirement and a robust case much be made to reduce parking provisions.*
 - It is submitted that a robust evidence based rationale for the level of car parking provision has been prepared and we refer the Bord to the Car Parking Strategy and Mobility Management Plan prepared by Waterman Moylan Consulting Engineers.

Miscellaneous

- *Presence of a stream may impact ecology perspective.*
 - We confirm that an Appropriate Assessment Screening Report is enclosed with this pre-planning submission. We can note at this time that an Ecological Impact Assessment will accompany any formal planning application which may progress.
- *Applicant is advised to use similar materials to the existing development.*
 - The proposed palette of materials will complement the existing development. Soft elevations around the public open spaces with continuous balconies and glazed façades.
 - Stone cladding as a protective shell along Brewery Road and Stillorgan Road, punctuated by the simple volumes of winter gardens.
- *Concern that the existing trees are in poor condition*
 - Once the applicant took ownership of the subject site in late 2018, an arborist was appointed to assess the existing trees and address any immediate issues. We confirm that a series of meetings has taken place with DLR CoCo Parks Department on this issue.

8.3 Planning Authority Pre-Planning Meeting 2

Following the conclusion of pre-planning application stage with An Bord Pleanála, the applicant sought to engage further with Dun Laoghaire Rathdown County Council on a number of planning matters. A summary of discussions held is set out below:

Brewery Road

- The Planning Department welcomed revisions to scheme and the improved relationship along Brewery Road.
- The Planning Department were comfortable with proposals for height.
- The applicant was requested to detail Brewery Road Improvement Scheme works on an architectural OMP drawings.



Car Parking

- The Planning Departments position on car parking provision and ratios was set out.
- The applicant set out the current proposal for car parking and the option for use of existing spaces in the permitted development if required.

Phase 2

- The Planning Authority was comfortable with masterplan proposals for a future Phase 2 development.
- It was suggested that masterplan imagery be 'ghosted out' for the purposes of the planning application.

Link to Park

- The Planning Authority was clear on the preference for a pedestrian connection to the adjoining Leopardstown Oaks Park. The applicant is committed to delivering the connection with the extent of works shown within the current red line boundary only.

EIAR

- It was agreed that an EIAR would be prepared on the new scheme only, with some reference to the cumulative development.

We trust the above commentary demonstrates that the Design Team has had full regard to the issues raised by the Planning Authority during the consultation stage.



9 STRATEGIC HOUSING DEVELOPMENT - PRE - PLANNING REQUEST

On 08 April 2019, a formal Strategic Housing Development pre-planning request was lodged with An Bord Pleanala. Reg. Ref. ABP-304147-19 refers.

This development related to a proposal for 268 residential units, a crèche facility and tenant amenities and was lodged as a build to sell development. A comprehensive pre-planning application was lodged with An Bord Pleanala setting out the basis on which the pre-planning request could be favorably considered.

The key changes between pre-application stage and planning application stage relate to the proposal now being a build to rent model and uplift to unit numbers and revisions to car parking.

9.1 Planning Authority Opinion

As part of this pre-planning process, Dun Laoghaire Rathdown County Council issued a formal opinion on the proposal, which was dated 03 May 2019.

The application currently submitted has reviewed this opinion and documentation enclosed herewith addresses all matters raised. We note specifically Section 11 of this report which sets out a response piece to the Planning items outlined.

9.2 Pre-Planning Meeting

A pre-planning meeting was held to discuss the proposal on 17 May 2019. We note that representatives from An Bord Pleanala, Dun Laoghaire Rathdown County Council and the Applicant attended this meeting.

The formal minutes from this meeting are enclosed herewith under separate cover. We confirm that the applicant has reviewed these minutes and application documentation enclosed herewith is reflective of all changes required.

9.3 An Bord Pleanala Opinion

Following consideration of the pre-planning application, a formal An Bord Pleanala Opinion dated 29 May 2019 was issued to the applicant for consideration.

A response to the An Bord Pleanala opinion is enclosed herewith as a separate report for review purposes. We note specifically that all matters raised have now been formally addressed and all prescribed bodies have been notified of the lodgement of this application as appropriate.



10 THE PROPOSAL

The development proposed in this case has been designed by award winning architects OMP Architects with input from an experienced design team. The proposed residential units are based on a brief from the applicant, being a world - wide real estate investor. At a local level, the applicant has successfully developed several quality residential schemes in Dublin including Clancy Quay, a significant regeneration project. The applicant's direct experience of the Dublin residential rental market has guided the form, mix and typology of units now proposed.

It is submitted that the proposed scheme is a considered response to the site, the specific planning history and the direction given in national planning policy and government guidance.

The extent of the site layout is set out below for context purposes.



Figure 17 - Site Layout

10.1 Overall Development Description

The proposed development shall provide for the demolition (total c. 1, 398 sq m GFA) of 'The Grange Select Marketing Suite' (1 storey), 'Oaktree Business Centre' (2 storeys) and 'The Lodge' (2 storeys); and the construction of a new residential scheme of 287 residential units; residential tenant amenity space of 961.5 sq m; a crèche facility of 658 sq m; and a substation of 96.5 sq m in the form of 6 new blocks (Blocks H, J, M, N, P and Q) ranging in height from 1 - 11 storeys as follows:

The residential development provides for 287 no. units (19 no. studio units, 125 no. 1 bed units and 143 no. 2 bed units) in Blocks H, J, M and N as follows:

- Block H (7 - 11 storeys from Brewery Road) comprising 99 no. apartments (6 no. studios, 50 no. 1 bed units and 43 no. 2 beds);



- Block J (5 - 10 storeys from Brewery Road) comprising 75 no. apartments (36 no. 1 bed units and 39 no. 2 bed units);
- Block M (4 - 9 storeys from podium) comprising 73 no. apartments (38 no. 1 bed units and 35 no. 2 bed units); and
- Block N (6 - 7 storeys from Brewery Road) comprising 40 no. apartments (13 no. studios, 1 no. 1 bed units and 26 no. 2 bed units).

Each residential unit has associated private open space in the form of a balcony/terrace/roof terrace.

The following residential tenant amenity space, crèche facility and substation proposals are also delivered:

- Blocks H (7 - 11 storeys) also contains a Tenant Amenity Space of 961.5 sq m. This area includes a gym space, male and female changing areas, accessible changing areas, a cinema room, entrance lobby, lounge areas, kitchen/dining areas, games area, management suite, 4 no. meeting rooms, co-working space, security/parcels area, storage areas, tea station, toilets, letter box area and all associated extraneous areas, all of which are areas dedicated to use by future tenants.
- Block P (3 storeys) provides for a crèche facility of c.658 sq m and associated outdoor play area in the form of a roof terrace of c.222.9 sq m.
- Block Q (1 storey at basement level/level 00) provides for an ESB substation of 96.5 sq m.

A basement area (total c. 3,324.8 sq m) is also proposed below Blocks H, J & M at Level 00. A total of 100 car parking spaces (16 at surface level and 84 at basement level), 596 bicycle spaces (518 at basement level and 78 at surface level) and 5 motorcycle spaces (all at basement level) are proposed. Waste Management areas and plant areas are also located at basement level.

Public open space is also proposed in the form of external residential amenity spaces, play areas, courtyards, gardens and trim trails (c.10,465 sq m). Provision is also made for pedestrian connections to the adjoining park to the south west, the N11 Stillorgan road to the North East and the existing 'The Grange' development to the south east.

Nos. 2 and 3 The Grange Cottages (single storey) are retained within the current proposal and works to these residential dwellings relate solely to landscape proposals. No works are proposed to the structure or layout of these units.

The development shall be accessed via the existing vehicular access point from Brewery Road. It is proposed to reconfigure the alignment of this vehicular access point to facilitate the proposed development and provide for improved access and egress for the overall 'The Grange' development.

The associated site and infrastructural works include provision for water services; foul and surface water drainage and connections; attenuation proposals; permeable paving; all landscaping works; boundary treatment; internal roads and footpaths; and electrical services.

10.2 Detailed Proposals

A detailed description is set out further below for the convenience of An Bord Pleanála in review.

Demolition

The properties proposed for demolition include:

- 'The Lodge' at Brewery Road Access Point
- 'The Grange Select Marketing Suite' and associated buildings along N11
- Office Building known as 'Oak Tree Business Centre'

Demolition extends to c. 1,398 sq m and buildings are not protected nor are they considered to be of any architectural merit. Demolition of the said buildings is a significant prerequisite in release of the



site for residential development. The location of the buildings for demolition, together with elevations and photographic evidence is submitted with this application.

We note at this point that there are additional and smaller ancillary buildings across the site, which qualify as exempted development for the purposes of demolition as set out under Class 50 of the Planning and Development Regulations 2001 as amended. In effect, these buildings do not require permission for demolition. We trust that this position is supported by An Bord Pleanala.

Residential Development

A total of 287 residential units are proposed in 4 Blocks (Blocks H, J, M & N).

Residential Mix is as follows:

- 19 x Studio Units (6.6%)
- 125 x 1 Bedroom Units (43.6%)
- 143 x 2 Bedroom Units (49.8%)

A total of 146 of the 287 units proposed have the benefit of dual aspect equating to 50.9% of the units.

Heights of 1-11 storeys are proposed and these heights are considered appropriate to the site and surrounding context framed by existing developments at The Grange and Beechwood.

Crèche Facility

A **Childcare Facility** of c. 658 sq m is proposed in 3 storey Block P. The location of the creche is intended to maximise on proximity to the primary access serving the scheme. Appropriate drop off and car parking will be provided at this location in the form of 8 spaces. We confirm that the crèche has capacity to cater for childcare demand arising from the existing development, the current proposal and indicative future phase 2 development.

The indicative unit breakdown for the existing, current proposal and potential future development is set out below for review by the competent authorities:

| Phase | Studio | 1 Bed | 2 Bed | 3 Bed | Total |
|--------------------|--------------|----------------|----------------|---------------|-------|
| Existing | - | 137 (27.1%) | 309 (61.1%) | 60 (11.8%) | 506 |
| Proposed Phase 1 | 19 (6.6%) | 125 (43.6%) | 143 (49.8%) | - | 287 |
| Indicative Phase 2 | 17 (8.8%) | 67 (34.7%) | 109 (56.5%) | - | 193 |
| Overall Total | 36 (3.6%) | 329 (33.4%) | 561 (56.9%) | 60 (6.1%) | 986 |

Figure 18 - Existing, Phase 1 and Phase 2 development

The following indicative summary mix is identified for a total of 986 units:

- 36 x studio apartment units
- 329 x 1 bedroom apartment units
- 561 x 2 bedroom apartment units
- 60 x 3 bedroom apartment units



It is noted that the 2 and 3 bed units should only be considered as contributing to a requirement for childcare in accordance with the provisions of the Apartment Guidelines of 2018. **A total of 621 units therefore have the potential to require childcare facilities.** We note the following calculations based on these uppermost requirements.

The Childcare Guidelines (2001) have identified that only 50% of units will require childcare. The following requirements are therefore identified:

- 50% of all 2 and 3 bed units = $621/2 = 310.5$
- 310.5 units - 1 facility required for every 75 units = $310.5/75 = 4.14$
- 20 childcare spaces required for every 75 units = $20 \times 4.14 = 82.8$ spaces required are required to address the requirements of the existing Grange Development, the current proposal and any potential further proposal for development.

A floor area figure of 2.32 sq m is generally applied per child space with extraneous areas delivered in addition. A standard facility of 192 sq m (+additional areas) is therefore required to serve the full extent of the existing Grange development (506 units), the current proposal (287 units) and potential future development (c. 193 indicative units).

This is based on a calculation of 2.32 sq m x 82.8 spaces required.

We note that extraneous areas such as kitchens, toilets, sleeping and other ancillary areas are deemed to be separate.

Having considered the above, the current proposal for a crèche facility of 658 sq m is considered acceptable in addressing the requirements of the existing Grange Development, the current proposal and any potential further proposal for development.

The policy basis on which the above calculations are applied are set out further in the Statement of Consistency enclosed herewith.

Tenant Residential Amenity

Blocks H and J also contain a Tenant Amenity Space of 961.5 sq m. This area includes a gym space, male and female changing areas, accessible changing areas, a cinema room, entrance lobby, lounge areas, kitchen/dining areas, games area, management suite, 4 no. meeting rooms, co-working space, security/parcels area, storage areas, tea station, toilets, letter box area and all associated extraneous areas, all of which are areas dedicated to use by future tenants.

This proposal is considered a significant addition to the overall scheme and further enhances the residential amenity associated with the proposal.

Density

Residential Density proposed at this site is set out as 287 units on a 1.8 ha site. This equates to 159.4 units per ha and is considered appropriate given the proximity of the site to public transport at the N11 bus corridor and the presence of the Sandyford Green Luas line stop c. 700m to the south west of the site. A density of this nature is supported by national policy which is aiming to deliver increased height and densities at appropriate locations.

Height

The new build element of the proposal ranges in height from 1 - 11 storeys as follows:



| Block | Height |
|---------|----------------------------------|
| Block H | 7 - 11 storeys from Brewery Road |
| Block J | 5 - 10 storeys from Brewery Road |
| Block M | 4 - 9 storeys from Podium |
| Block N | 6 - 7 storeys from Brewery Road |
| Block P | 3 storeys |
| Block Q | 1 storey (ESB substation) |

Table 2 - Proposed Heights

The heights proposed are supported by national policy and are reflective of existing heights in the immediate context (The existing Grange Development and Beechwood development on the opposite side of the N11).

Car / Bicycle / Motor Cycle Parking

A total of 100 car parking spaces are proposed. 84 spaces are located at basement level and 16 at surface level.

The 84 spaces at basement level and 8 additional spaces at surface level (identified as designated visitor parking) will cater for the residential element of the scheme (287 units) at a ratio of 0.32 spaces for each unit proposed. The remaining 8 spaces proposed at surface level spaces will accommodate the creche proposal in terms of drop off and staffing requirements.

We can also confirm that there are an additional 100 residential spaces available to the development in the existing basement of the Grange. All considered, a total of 192 spaces are available to the new development (92 proposed residential spaces and 100 existing spaces in the basement). The total 192 spaces available to the residential development would uplift the car parking ratio to 0.66 spaces per unit.

Whilst the applicant considers the ratio of 0.32 spaces per unit as proposed (92 spaces for 287 residential units) appropriate to serve the development, given the accessible nature of the site and proximity to key public transport nodes, the ratio of 0.66 units per unit alleviates any potential for concern over the provision of parking. The enclosed car parking strategy report from Waterman Moylan and Section 12.4 of this report sets out further justification for this provision.

A total of 596 bicycle spaces are proposed (518 at basement level and 78 at surface level).

A total of 5 motorcycle spaces are proposed at basement level.

Public Open Space

The delivery of a central public area of open space and a quality landscape plan has been a key objective from the outset of design. We note that the current design delivers a generous and central open space area with a permeable landscape layout which will be accessible to all users.

The open space strategy has been focused on providing connected and functional spaces that provide excellent amenity for residents and knit successfully into the existing context.

We note that the public open space requirements set out in the Development Plan are for 15 sq m per person at a rate of 1.5 persons for 1 and 2 bed units. **We note that a default minimum of 10% of the total site area should be delivered in terms of open space.**



In addition, we recognise that the Apartment Guidelines (2018) set out requirements for minimum communal open space provision.

The current proposal has successfully delivered on the minimum 10% requirement of the Dun Laoghaire Rathdown Development Plan 2016-2022 and the communal standards of the Apartment Guidelines.

We note the following breakdown in this regard:

DLR Standards

10% of the total site area - Site Area 18,163 sq m = 10% Public Open Space requirement is **1,816.3 sq m**.

Apartment Guidelines Standards

Communal Open Space Requirements:

4 sq m for studios - 19 x 4 sq m = 76 sq m

5 sq m for 1 beds - 125 x 5 sq m = 625 sq m

7 sq m for 2 beds - 143 x 7 sq m = 1,001 sq m

Total Communal Open Space required = 1,702 sq m

A total of 10,465 sq m of public open space is proposed at this location. This provision is over and above requirements of the relevant Development Plan and the Apartment Guidelines.

We note specifically that 57.6% of the total site area is dedicated as public open space, which is significant for a key suburban location, proximate to public transport nodes.

It is our view that proposals are therefore sufficient in addressing requirements.

10.3 Part V Provision

The proposal provides for 29 Part V residential units within the scheme, which is a significant number of units in meeting the social housing requirements of Dun Laoghaire Rathdown County Council. The proposals provide for 11 studio units and 18 x 2 bed units in Block N. We refer the competent authorities to the detailed Part V booklet enclosed herewith, which clearly sets out the following in relation to the overall Part V proposal:

- Location of the Units
- Floor Plans
- Elevations
- Schedule of Accommodation
- Detailed Costings

Note: Please note that the content of this proposal is purely indicative and is intended to provide a reasonable estimate of the costs and values of the units based on construction costs and values prevailing at the time of the application. Please also note that the information set out herewith is purely for the purposes of facilitating the making of a valid planning application and will ultimately be subject to possible amendment and formal agreement with the Local Authority. The financial data contained herein is provided to the level of detail commensurate with this stage of the Part V process having regard to Circular Letter 10/2015 and should be read as being indicative as a result. We note under the Amendment to the Act and its accompanying Regulations that the ultimate agreement with regard to Part V is dependent a) upon receipt of a final grant of permission and b) upon a site value at the time the Permission is granted; neither of which can be available at this time.



The above is obviously subject to change depending upon the nature of any final grant of permission, including Conditions and the assessment by the Housing Authority of the ultimate proposal. Final costs will be based on site value at the time the Permission is granted.

Finally, we would wish to highlight that the above information is being provided on a wholly without prejudice basis in order to comply with the Planning & Development Regulations in force at this time. The final details of any agreement with the Local Authority regarding compliance with Part V, including agreements on costs will not be arrived at until after planning permission has been secured as is provided for under the Planning & Development Act 2000, as amended.

10.4 Additional Proposals

In addition to the description set out above, we note that there is a comprehensive -planning package now submitted setting out a description of proposals. In this regard, we refer An Bord Pleanala to the following inputs as appropriate:

Core Design Team:

- O'Mahony Pike Architects - Full Set of Architectural Proposals, Part V Proposals
- Brock McClure Consultants – Full Suite of Planning Reports and Associated Material
- Waterman Moylan - Full Set of Engineering/Service Proposals
- OCSC - Full Set of Electrical Service Proposals
- Mitchell Associates - Full set of Landscape Proposals
- The Tree File - Full Set of Arboricultural Proposals
- Waterman Moylan - Full set of Drainage, Traffic and Transportation Proposals, Flood Risk and Construction Management Proposals

Other Consultants:

- Aramark - Building Lifecycle Report and Estate Management Strategy
- ARC - Detail on Daylight and Sunlight and Visual Impact Assessment
- AWN - Operational Waste Management Proposals
- Scott Cawley - Details on matters of Ecology
- The Tree File - Details on Arboricultural Proposals
- Irish Archaeological Consultancy Ltd - Details on Cultural Heritage
- B Fluid - Details on the Microclimate associated with the development

10.5 Environmental Impact Assessment Report

We confirm for the competent authority that an Environmental Impact Assessment Report has been prepared and accompanies planning documentation enclosed herewith.



11 RESPONSE TO PLANNING AUTHORITY OPINION

The Planning Authority opinion dated 03 May 2019 set out a number of concerns with certain elements of the proposal which, in the opinion of the Planning Authority, required further consideration by the Applicant.

For the purpose of this report, the DLR planning opinion piece followed by the applicant response is outlined in brief below. The response items are largely informed by detailed included in the planning application material enclosed herewith.

1. **Poor Relationship with Brewery Road in terms of visual impact the development lacks spacing from Brewery Road that would contribute to the setting of the proposed buildings of this scale.**

Applicant Response

The relationship of the proposed development to Brewery Road has been revised by way of the current proposal now submitted. Significant consideration has been given to the relationship of the proposal to existing development in the area; the heights proposed; set backs; the interface along Brewery Road; boundary treatments and the public realm; ground floor elevational treatment; and future development potential.

The improvements to the scheme are clearly set out in the OMP document entitled 'Response to An Bord Pleanala's notice of Pre-Application Consultation Opinion' and the Brock McClure report entitled 'Statement of Response to An Bord Pleanala Opinion'.

Visually, the enclosed CGIs from Modelworks (as included in the OMP Design Statement) clearly set out the new appearance of the buildings proposed along Brewery Road.

The key images are included below for reference.



Figure 19 - Brewery Road CGI



Figure 20 - Brewery Road Entrance

2. **This poor relationship with Brewery Road needs to be addressed also in terms of the heights proposed, with lower buildings on the north end of the site, with the height increasing to the rear (south) of the development where heights exist within the existing Grange Development.**

Applicant Response

With regard to height, we note that the context for height along Brewery Road, has been largely informed by (a) the recent policy mandate for increased building heights and densities at appropriate locations (public transport corridors) and (b) through the preparation of a suite of reports which have set the limiters for heights achievable without impacting on the existing site context. These include a Daylight and Sunlight Analysis from ARC Architectural Consultants, a Wind and Microclimate Assessment from BFluid and OMP modelling of the development in terms of scale, massing and form.

Heights along Brewery Road are as follows:

- Block J (5-10 storeys)
- Block H (7-11 storeys)
- Block M (4-9 storeys)

The proposals for height have been examined in detail vis a vis policy contained within Appendix 9 – Building Height Strategy of the Development Plan, the Building Height Guidelines of 2018 and the National Planning Framework and the enclosed documentation from Brock McClure confirms that the proposal fully complies with the various requirements.

From a design perspective, we note the following comment from OMP Architects as set out in the 'Response to An Bord Pleanála's notice of Pre-Application Consultation Opinion':

- *"The heights along Brewery Road are carefully modulated.*
- *The buildings are designed as a series of pavilions of varying height and width, with the break in volume indicating points of entry.*
- *Two wide lower blocks (H and N, 7 storey) frame the entrance road, redefined as the development's new front door.*



- *Tallest block along the road (J, 9+1 storey) sits where distances to houses of Woodward Lawn is greatest (65m).*
- *Small element of block J is of reduced scale (5 storey) to mitigate impact on existing cottage not in the ownership of the applicant.”*

It is evident from the above, that the heights proposed in this case have been carefully considered and it is the view of the applicant and design team that the site can successfully absorb the heights proposed. This is particularly the case given the corner nature of the site and given government policy to increase heights and densities along key transport corridors. Furthermore, documentation enclosed herewith has confirmed that there is no significant impact from the heights proposed on exiting levels of residential amenity, which is a significant factor for consideration in assessment of the matter.

3. **Blank elevations on the side facing elevations of Block J would not be acceptable, this needs to be addressed. Other blank elevations noted are within Block N at ground level, that also require work.**

Applicant Response

The current proposal has addressed all concerns raised with regard to blank elevations and we refer to revised drawings enclosed, which are summarised below for context purposes.



Figure 21 – Current Block J Elevations



Figure 22 - Current Block N Elevations

4. There is concern with how the level differences across the site are being dealt with on the site.

Applicant Response

The OMP document entitled 'Response to An Bord Pleanála's notice of Pre-Application Consultation Opinion' sets out significant detail on the accessibility of the site.

Key improvements include:

- **The connection from the N11 to the existing public open space** has been redesigned. The scheme has been reconfigured to reduce the level of the central open space by c. 2m to improve accessibility to and through this area. This measure allows for greatly enhanced accessibility into the scheme and permeability throughout the development. A new path is included in the temporary green space to the south of the Grange Cottage to complete the connection with level access now delivered from the adjacent Leopardstown Oak Park to the N11.
 - **The connection from Brewery Road to the existing central garden** has also been reconfigured. Again, the level of the open space area has been dropped by 2m. There is a single level change on Brewery Road (4m). The ground levels of open space match those of key interfaces i.e. The Grange Cottages and Block G entrances. There is enhanced connection (lift and ramps) to the existing open space area. Lastly, the existing path to the south of the site has level access to the existing central open space.
 - **The connection to the exiting Grange Central Garden** has also been the subject of revised design proposals. The existing fire tender access route outside Block G (Jade) has been upgraded and is incorporated into the new landscape setting. The character of this space has been revised from hard to soft treatment to enhance the connection to the existing open space area. Significant soft landscaping proposals have been included in the design. An existing retaining wall is removed and ground levels dropped to improve connectivity. Enhanced connection (lift, steps and ramps) to the existing garden are included to improve universal access. Lastly, the existing steps are widened to enhance the visual connection between the developments.
 - **Connections to existing areas of open space** have also been considered as part of the design. Most notably, proposals are delivered within the red line boundary for a future connection to Leopardstown Oaks Park.
5. In relation to the proposed bridge link to the rear of Grange Cottage, there are concerns in terms of impact on the residential amenity of the properties at 1-3 Grange Cottages.



Applicant Response

This proposed bridge link has been removed from the development design and there are no longer any concerns in relation to the impact on existing levels of residential amenity afforded to No. 1 The Grange Cottage.

We note that Nos. 2 and 3 The Grange Cottage are within the ownership of the applicant and it is intended that these units will be demolished as part of a future phase of development.

- 6. There is a need for a universal access plan to illustrate a suitable route for those with mobility issues.**

Applicant Response

We refer the Planning Authority to the enclosed Universal Access Statement prepared by OHAC.

Furthermore, we note that pages 42-50 of the enclosed OMP document entitled 'Response to An Bord Pleanála's notice of Pre-Application Consultation Opinion' sets out a visual representation of the accessibility of the scheme.

- 7. Wind mitigation measures suggested in the Wind Desktop study would need to be introduced in to the design of the proposed buildings.**

Applicant Response

Wind Mitigation Measures as set out in the enclosed EIAR have been incorporated into the development design as submitted.

- 8. The level of car parking on the site needs to be increased.**

Applicant Response

The applicant has reviewed the matter of parking in detail since the initial pre-planning stage of development.

The nature of the scheme has been changed from 'build to sell' to a 'build to rent' model.

As set out previously, a total of 100 car parking spaces are proposed. 84 spaces are located at basement level and 16 at surface level.

The 84 spaces at basement level and 8 additional spaces at surface level (identified as designated visitor parking) will cater for the residential element of the scheme (287 units) at a ratio of 0.32 spaces for each unit proposed. The remaining 8 spaces proposed at surface level spaces will accommodate the creche proposal in terms of drop off and staffing requirements.

We can also confirm that there are an additional 100 residential spaces available to the development in the existing basement of the Grange. All considered, a total of 192 spaces are available to the new development (92 proposed residential spaces and 100 existing spaces in the basement). The total 192 spaces available to the residential development would uplift the car parking ratio to 0.66 spaces per unit.

Whilst the applicant considers the ratio of 0.32 spaces per unit as proposed (92 spaces for 287 residential units) appropriate to serve the development, given the accessible nature of the site and proximity to key public transport nodes, the ratio of 0.66 units per unit alleviates any potential for concern over the provision of parking. The enclosed car parking strategy report



from Waterman Moylan and Section 12.4 of this report sets out further justification for this provision.

9. There is concern that there is no visitor car parking proposed.

Applicant Response

A total of 8 visitor car parking spaces have been delivered as part of current proposal submitted. The location of these spaces is identified below:



Figure 23 - These spaces are located adjacent to the existing Jade block

10. Accessibility through the site – concern regarding the stepped access.

Applicant Response

The response Item 4 above sets out the current revised proposals for accessibility through the site. The ABP response document enclosed from OMP Architects also sets out significant detail in relation to the accessibility of the scheme.

11. Removal of significant number of trees from the site.

Applicant Response

The current planning application includes detailed input from The Tree File. The quantum of trees lost is identified as

- 33 No. Category U trees – Trees that are dead, dying or dangerous**
- 13 No. Category B trees – Trees of moderate quality**
- 33 No. Category C trees – Poor quality trees of limited value**

Evidently, only 13 moderate quality trees are proposed for removal. The Arboricultural Report sets out the following in terms of quantifying overall tree loss.

Notwithstanding the above, it is noted from the project landscaping proposal provided by Mitchell Associates Landscape Architects, that some 472No. This includes 261no of semi mature trees including natives and more exotic species as accent trees, 30no of standard sized natives, 60no of feathered size natives, 40no additional trees along the park boundary including natives and evergreens, with an additional 81no of ornamental trees for installation on the podium. This effectively provides for a 612% increase over the proposed loss of 77 trees as a result of the site development.



In addition to the above, it is also noted that an additional 760 smaller native whips will be installed as part of the broader tree replacement mix (page 3).

It is in consideration of the above that we submit proposal to be acceptable.

12. CGI images submitted include trees on the site that are to be removed, the applicant is advised to submit accurate CGIGs that include the landscaping proposal.

Applicant Response

Revised CGI images and verified views are included with this planning application. All imagery is accurate and reflective of landscaping proposals and proposals for tree removal.

13. Details of the proposed link through to the neighbouring area of Open Space at Leopardstown Oak requires further detail.

Applicant Response

The applicant is committed to the delivery of a pedestrian link between the development site and the adjoining Leopardstown Oaks Park. We refer specifically to the landscape proposals enclosed herewith from Mitchell & Associates and specifically the landscape masterplan for this locations.

Proposals generally deliver the removal of a fence to create a 3.5m wide connection to the adjacent park. These works are delivered within the application red line boundary. We note that the applicant is not in a position to deliver any works outside of the red line boundary. However indicative proposals enclosed with the landscape pack show how treatment on the Leopardstown Oaks Park side of the boundary can be delivered.

The extent of proposals are shown in Figure 26 below.



Figure 24 - Proposed Connection to the Park

14. Details of the phasing of the proposed development would be required.

Applicant Response

The proposal will be delivered as a single phase development. The construction management plan enclosed herewith from Waterman Moylan contains further detail on this phasing.



15. Details of external finishes, a high quality of external finishes would be required that would be in line with the existing palette.

Applicant Response

We refer An Bord Pleanála to the design statement and enclosed drawings prepared by O'Mahony Pike Architects for full detail on the quality of external finishes. We note specifically that a nuanced approach is proposed for the façade treatment as set out in the enclosed OMP document entitled 'Response to An Bord Pleanála's notice of Pre-Application Consultation Opinion' page 57. The following commentary on materiality is identified:

- Brick cladding as a protective hard wearing shell on the tall blocks and along the main route into the scheme.
- Soft elevations - rendered facades - around the more private areas and small building elements. This will provide contrasting texture and colour, adding variety and a more domestic scale to the smaller blocks.
- Soft contrasting penthouse levels in dark grey render add contrast and definition to the skyline.
- Windows and balconies are metal, with clean sharp lines contrasting with the rougher brick and warm render.
- Windows are detailed with a side panel of similar colour, which helps create a look of openness and lightness for the facade, with the brick or render appearing as a lattice between the perceived openings.
- The ground floor of block H, which hosts the concierge and resident's amenities will be clad in stone along the realigned access road and the pedestrian spine, to denote its special nature and add interest.
- Where roofs are not intended for private use, green roofs are proposed throughout.

16. Block N is poorly served with no parking within close proximity to the building and the communal waste is located within Block M, with no independent provision for Block N.

Applicant Response

The design and accessibility of Block N has been given detailed consideration by the design team to address the specific concerns identified. A pedestrian crossing is proposed for Block N to access the car parking, waste areas, residential amenity area, concierge, set down/delivery area and central green space. This ensures easy connectivity for residents of Block N. The access route for Block N is set out in Figure 27 below.

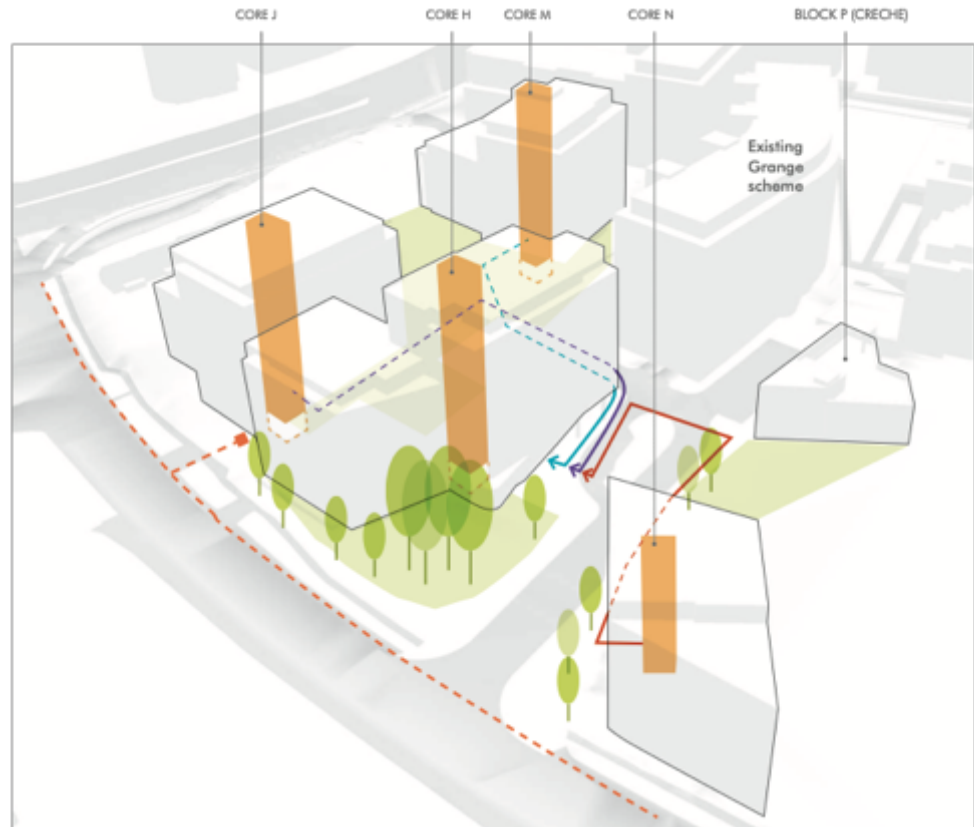


Figure 25 - Access Route for Block N

The access and circulation routes to Block N is summarised below:

| DIRECT ACCESS | Core H | Core J | Core M | Core N |
|-----------------------------|--------|--------|--------|--------|
| Car park (Level 00) | ✓ | ✓ | ✓ | ● |
| Resident Amenity (Level 01) | ✓ | ● | ● | ● |
| Concierge | ✓ | ● | ● | ● |
| Set Down/ Delivery | ✓ | ● | ● | ● |
| Central Green Space | ✓ | ✓ | ✓ | ● |

- route from Block M through central green space
- route from Block J through central green space
- route from Block N through across entrance road
- residents' cyclists access to private sheltered bicycle parking



17. **The plans submitted are at a scale of 1:200 at A1, it is noted that the majority of plans submitted were in A3 making it difficult to make a full assessment of the proposed development.**

Applicant Response

Full scale drawings are now enclosed herewith for review as part of this SHD planning application.



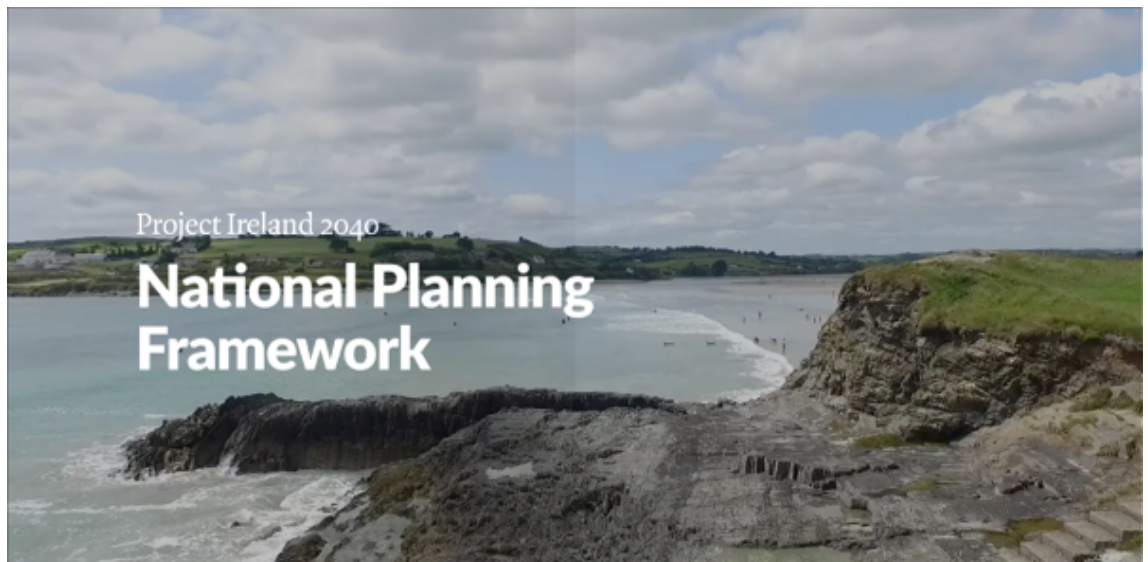
12 NATIONAL PLANNING POLICY

The following documents are reviewed and compliance of the proposal with same is identified:

- Project Ireland - National Planning Framework (2040) is the relevant national planning framework governing the subject site.
- Rebuilding Ireland - Action plan for housing and homelessness is also relevant to this site as outlines the need for large scale housing development within appropriate, urban locations in order to combat the lack of existing housing stock.
- Regional Spatial and Economic Strategy - This Strategy provides for a spatial, economic, metropolitan, climate change and investment strategy for the eastern and midlands region.

Each of these documents is now review below.

12.1 Project Ireland - National Planning Framework (2040)



The National Planning Framework (NPF) is the Government's high-level strategic plan for shaping the future growth and development of our country out to the year 2040.

The NPF sets out that it intends to achieve this vision by:

- Developing a new region-focused strategy for managing growth;
- Linking this to a new 10-year investment plan, the Project Ireland 2040 National Development Plan 2018-2027;
- Using state lands for certain strategic purposes;
- Supporting this with strengthened, more environmentally focused planning at local level; and
- Backing the framework up in law with an Independent Office of the Planning Regulator.

The strategy for the capital is as follows:

- Supporting the future growth and success of Dublin as Ireland's leading global city of scale, by better managing Dublin's growth to ensure that more of it can be accommodated within and close to the city.
- Enabling significant population and jobs growth in the Dublin metropolitan area, together with better management of the trend towards overspill into surrounding counties.



- Addressing infrastructural bottlenecks, improving citizens' quality of life and increasing housing supply in the right locations.

The NPF sets out that the Eastern and Midland part of Ireland will, by 2040, be a Region of around 2.85 million people, at least half a million more than today. It is identified that progressing the sustainable development of new greenfield sites for housing and particularly those close to public transport corridors is key to enabling growth.

The following policies are considered the relevant policy objectives in the context of this site:

National Policy Objective 1 -

Planning for a population in the Eastern and Midland Region of 490,000 - 540,000 additional people i.e. a population of around 2.85 million;

National Policy Objective 3a -

Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements.

National Policy Objective 3b -

Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints.

National Policy Objective 11 -

In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.

National Policy Objective 13 -

In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high quality outcomes in order to achieve targeted growth. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected.

National Policy Objective 31 -

Prioritise the alignment of targeted and planned population and employment growth with investment in the provision of childcare facilities and new and refurbished schools on well located sites within or close to existing built up areas that meet the diverse needs of local populations.

National Policy Objective 32 -

To target the delivery of 550,000 additional households to 2040.

National Policy Objective 33 -

Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.

National Policy Objective 35 -

Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.

It is evident that the National Planning Framework (NPF) 2018, recommends compact and sustainable towns / cities and densification of urban sites including brownfield and infill sites. The themes of compact and sustainable development are further reinforced by policy objective NPO 35 from the NPF



as this policy recommends increasing residential density in settlements including infill development schemes and increasing building heights.

Having considered the above, it is our view that the current proposal complies with the above national policy on the following basis:

- The current proposal for 287 residential units in a development of 1-11 storeys in height is a well -designed, high quality scheme and one that has carefully considered existing levels of residential amenities at adjoining residential development, The Grange.

We note in particular that the residential amenity of the proposed development was considered in detail at a very early stage in the design evolution. This application includes supporting documentation from OMP Architects and ARC Architectural Consultants which demonstrates specifically how the proposed development maintains existing and proposed levels of residential amenity in terms of urban design and access to daylight and sunlight specifically.

- The site is considered a key suburban infill site and one that is appropriate for increased residential densities and heights. This is particularly the case given proximity to public transport nodes. Most notably, the site is located adjacent to an existing Bus Priority Route along the N11 and ancillary bus routes along Bewery Road. The site is also located c.1.1km from the nearest Green Luas line stop at Sandyford. The site is therefore well placed in terms of exceptional public transport accessibility.
- The site is a large infill site located to the north of a landmark residential development along the N11. The proposed development is in keeping with the morphology and density of the existing site, which ensures a cohesive and efficient use of well serviced vacant land.

Having considered the above, it is submitted that the current proposal for c.287 new residential units, a crèche facility and residential tenant amenity space will deliver on key objectives contained within the NPF. We note specifically that the addition of 287 new residential units will be a modest and proportionate increase to population within the Stillorgan area. The site is also zoned for residential development and is considered appropriately serviced with appropriate infrastructure to deliver on a sustainable residential development in close proximity to the main town centre area and public transport nodes.

We submit to the Bord that the current proposal is supportive of the objectives of the National Planning Framework for 2040.

12.2 Rebuilding Ireland: Action Plan for Housing and Homelessness



The action plan for housing and homelessness recognises that a significant increase in new homes is required. The action plan outlines a 5 pillar approach as follows:



- Pillar 1 - Address Homelessness
- Pillar 2 - Accelerate Social Housing
- Pillar 3 - Build More Homes
- Pillar 4 - Improve the Rental Sector
- Pillar 5 - Utilise Existing Housing

The plan outlines that “Accelerating delivery of housing for the private, social and rented sectors is a key priority for the Government. Ensuring sufficient stable and sustained provision of housing that is affordable, in the right locations, meets peoples different needs and is of lasting quality is one of the greatest challenges facing the country at present.”

The plan repeatedly states the need for housing to be in appropriate locations, locations within Dublin and urban or central locations, “In addition to the scale of housing provision, the delivery of housing in the right place is also central to enabling a good standard of living and improving quality of life. Locating housing in the right place provides the opportunity for wider family and social networks to thrive, maximises access to employment opportunities and to services such as education, public transport, health and amenities, while also delivering on sustainability objectives related to efficiency in service delivery and investment provision.”

The proposed development supports Pillar 3 of the plan specifically by way of the delivery of 287 rental units at a key location along the N11. The proposal for Build to Rent Accommodation will provide alternative, affordable residential accommodation in an area of high demand. The site has the benefit of accessibility to both Luas and Bus public transport services and is considered a significant opportunity site for the delivery of residential units.

Pillar 4 of the Rebuilding Ireland initiative also focuses on the delivery of rental units in Ireland.

The overall vision of Pillar 4 is as follows:

*“Government housing policy aims to ensure that, to the greatest extent possible, every household can access secure, good quality and affordable housing suited to its needs and located within sustainable communities. Within that, our vision is for **a strong, viable and attractive rental sector supported by a policy and regulatory framework that delivers long term affordable and high quality accommodation solutions meet diverse tenant needs, and a secure, predictable investment environmental for landlords and accommodation providers** (page 7).”*

It is further stated that delivering on this vision will require “a comprehensive set of measure based around strategic objectives over short, medium and long term horizons. The primary focus must be on addressing the root cause of the current difficulties, which centres around a lack of supply, particularly in the middle to lower segment of the market. **A very significant proportion of the Rebuilding Ireland target of delivering 25,000 units of housing supply per annum will need to be provided for in the rental sector. The traditional dominance of the build to sell model must evolve to provide for increased deliver of housing intended specifically for rental purposes. Our perception of the section as a short - term tenure option must also evolve.** (page 7)”

The current proposal for rental accommodation is considered particularly supportive of Pillar 4 of the Rebuilding Ireland Initiative. It is considered that the current proposal is a significant move forward within the Dun Laoghaire Rathdown Area in terms of the delivery of accommodation in that to date, only 1 application for Build to Rent Accommodation has received permission within the Strategic Housing Development process.



12.3 Regional Spatial and Economic Strategy



The *Regional Spatial and Economic Strategy for Eastern and Midland Regional Assembly (RSES)* has recently been published and adopted.

The RSES provides a:

- **Spatial Strategy** – to manage future growth and ensure the creation of healthy and attractive places to live, work, study, visit and invest in.
- **Economic Strategy** – that builds on our strengths to sustain a strong economy and support the creation of quality jobs that ensure a good living standard for all.
- **Metropolitan Plan** – to ensure a supply of strategic development areas for the sustainable growth and continued success and competitiveness of the Dublin metropolitan area.
- **Investment Framework** – to prioritise the delivery of key enabling infrastructure and services by government and state agencies.
- **Climate Action Strategy** – to accelerate climate action, ensure a clean and healthy environment and to promote sustainable transport and strategic green infrastructure.

The site is identified as being located in the 'Dublin City and Suburbs' and is part of the Dublin Metropolitan Area as set out below:



Figure 26 – Dublin City and Suburbs

The Dublin Metropolitan Area Strategy Plan (MASP) in Chapter 5 of the RSES identifies a number of large – scale strategic residential and economic development areas, that will deliver significant development in an integrated and sustainable manner in the metropolitan area. The requirement for the preparation of MASP was set out in Project Ireland 2040 - National Planning Framework. MASP provides for a 12-20 year strategic planning and investment framework for the Dublin Metropolitan area.

The following Housing and Regeneration Policy Objectives are considered relevant to the current proposal:

MASP Housing and Regeneration

“RPO 5.4: Future development of strategic residential development areas within the Dublin Metropolitan area shall provide for higher densities and qualitative standards as set out in the ‘Sustainable Residential Development in Urban Areas’, ‘Sustainable Urban Housing; Design Standards for New Apartments Guidelines and ‘Urban Development and Building Heights Guidelines for Planning Authorities.”

“RPO 5.5: Future residential development supporting the right housing and tenure mix within the Dublin Metropolitan Area shall follow a clear sequential approach, with a primary focus on the consolidation of Dublin and suburbs, and the development of Key Metropolitan Towns, as set out in the Metropolitan Area Strategic Plan (MASP) and in line with the overall Settlement Strategy for the RSES. Identification of suitable residential development sites shall be supported by a quality site selection process that addresses environmental concerns.”

Aside from the above core policy objectives, it is clear that the RSES supports continued population and economic growth in Dublin City and suburbs, with high quality new housing promoted and a focus



on the role of good urban design, brownfield redevelopment and urban renewal and regeneration. It is set out that there is an opportunity to promote and improve the provision of public transport and active travel and the development of strategic amenities to provide for sustainable communities. In terms of consolidation and re-intensification, the following policy objective is noted:

Consolidation and Re-Intensification

“RPO 4.3: Support the consolidation and re-intensification of infill/brownfield sites to provide high density and people intensive uses within the existing built up area of Dublin City and suburbs and ensure that the development of future development areas is co-ordinated with the delivery of key water infrastructure and public transport projects.”

Having reviewed the key policies of the recently adopted RSES document, we are of the view that the current proposal complies with the spirit and intent of RSES for the following reasons:

- The development proposal delivers an appropriate level of residential density at 159.4 units per ha (site area of 1.8 ha and 287 units proposed) and has had regard to specifically to standards as set out in the 'Sustainable Urban Housing - Design Standards for New Apartments Guidelines for Planning Authorities (2018)' and 'Urban Development and Building Heights Guidelines for Planning Authorities (2018)' in ascertaining an appropriate residential density, height and car parking provision for the site.
- The current proposal delivers a consolidated approach to development in that it maximises on height, delivers an appropriate site coverage and residential density along a key public transport corridor.
- The proposal utilises a key infill site on a prime suburban site within the metropolitan area of Dublin. The delivery of residential development at this location is considered appropriate to this built up area of Dublin.

12.4 National Policy Summary

The National Planning Framework signals a shift in Government policy towards securing more compact and sustainable urban development, which requires at least half of new homes within Ireland's cities to be provided within the existing urban envelope.

A significant and sustained increase in housing output and apartment style development is therefore necessary to support government policy. National policy also recognises that at a metropolitan scale, development should focus on underutilised land within the canals and the M50 ring and a more compact urban form should be facilitated through well designed higher density development.

National policy further supports and reinforces the need for urban infill residential development in close proximity to quality transport routes and within existing urban areas. The current proposal is one such location with the site located along a Bus Priority Route and proximate to Stillorgan Village.

Given the site's residential zoning; proximity to public transport; and accessibility to local services, the current proposal is considered to comply with national policy objectives. More specifically, the delivery of residential development on this prime, infill, underutilised site, in a compact form, comprising well designed, higher density units, it is our considered view that the proposal would be consistent with the policies and intentions of the National Planning Framework, Rebuilding Ireland and Regional Spatial and Economic Strategy.



13 CONCLUSION

We note the following key points for review at this time:

- Kennedy Wilson are recognised as setting the standard in terms of development and operation of larger scale Build to Rent schemes in Ireland centred around the provision of sustainable, high quality accommodation, resident amenities and professional management. Kennedy Wilson currently manage over 2,400 apartments in Ireland with a further 1,500 units in design or under construction. Kennedy Wilson's award-winning developments have been identified as exemplar projects by local authorities, government agencies and internationally accredited industry groups across design, build quality, resident amenities, public realm and placemaking.
- As a long-term owner and operator of over 28,000 units worldwide Kennedy Wilson understand the importance of ensuring future resident experience is factored into the design process from inception. Kennedy Wilson's objective is to create vibrant communities and neighbourhoods where residents will want to live.
- Kennedy Wilson's objective is to create vibrant communities and neighbourhoods where residents will want to live underpinned by a focus on industry leading urban design, placemaking, sustainability and technological innovation
- The subject site is a prime underutilised suburban site located proximate to key public transport nodes and major areas of employment. The site is therefore optimally located to provide for a higher residential density and additional height in compliance with the national policy mandate.
- The Masterplan successfully integrates this new phase of development with the existing built fabric of The Grange to consolidate a cluster of higher buildings with a strong sense of place. The proposal is reflective of existing patterns of development, notably at the existing Grange development, and of emerging residential developments along the N11.
- The current proposal has successfully addressed the reasons for refusal previously set out under Reg. Ref. D07A/1771 & PL06D.228499. This application provides for consolidation of the Brewery Road frontage, a critical consideration in the assessment of the matter of visual impact and height along Brewery Road. The buildings have been sited to address Brewery Road providing animation and access to the heart of the scheme. Permeability is a core concept and the scheme is highly accessible throughout.
- The residential units proposed are of exceptional quality, with appropriate floor areas, private open space provisions, connections to public transport and car parking facilities. Careful attention has been given to permeability with the surrounding context and to the protection of existing levels of residential amenity afforded to No. 1 The Grange Cottage and to properties along Brewery Road.
- The proposal is in accordance with the relevant statutory policies and guidelines (as set out herein and within the Statement of Consistency enclosed) and there is an appropriate planning context for this proposal. The proposed use is acceptable in principle at this site and under this zoning. We note specifically that the proposed height, density and public open space provision for this scheme is well founded in the context of the provisions of the Dun Laoghaire Rathdown County Development Plan 2016-2022 and National planning policy and Ministerial Guidelines.
- We can confirm that we have addressed insofar as possible all pre-planning feedback from the various departments at Dun Laoghaire Rathdown County Council.



14 **Appendix 1 – Pre Planning Notes and Correspondence**

- Planning Authority Notes
- Applicant Notes
- Correspondence with Parks
- Correspondence with Housing



Planning Authority Notes

PRE-PLANNING APPLICATION MEETING

Record in Accordance with Section 247 of the Planning & Development Act 2000

Pre Planning Reference Number - PAC/SHD/512/18

Date of Consultation - Pre Application Meeting held 18th Dec 2018 – On site.

Present at Consultation:

Suzanne McClure – Brook McClure

Linda McEllin – Brook McClure

Peter McKenna - Kennedy Wilson

Conor Kinsella - OMP Architects

Waterman Moylan

Mitchell Associates

DLR Planners and Technical

- Louise McGauran – Senior Planner (LMcG)
- Michele Costello – Senior Executive Planner (MC)
- Marguerite Cahill – Executive Planner (MCA)
- Naoimh Fleming – Executive Planner (NF)
- Bernard Egan – Drainage Department
- Johanne Codd – Drainage Department
- Tom Kane – Parks Department
- Claire Casey – Transportation Dept.

Attention drawn to "Without Prejudice" Yes

Person has an interest in land and intends to make a planning application Yes –

Full address of property: The Grange, Brewery Road, Stillorgan, Co. Dublin

Brief description proposal:

- Residential Development of 263 Units (Apartments), crèche facility, amenity space and café, car (183) and cycle parking (534), the development will take place over in 5 Blocks (4 Resi & one creche) in varying in heights from 1 to 9 stories.
- Proposed Density of 164dph.

The works will also include the demolition of existing buildings on the site –

- The gate lodge
- The Grange Marketing Suite and associated buildings along the N11
- Offices known as Oak Tree Business Centre

The site has an area of 1.6ha.



There is an Objective on the site to "Protect and preserve trees and woodlands".

The site is zoned Objective A and Objective F within the County Development Plan 2016-2022.

Key Points –

Applicant's Introduction

- The applicant states that the proposal will be similar to their current arrangement at the Grange and at Clancy Place (Dublin 8) as a private rental model. The applicant notes that the development will not be a Build to Rent development.
- The applicant should note that there is a lengthy planning history associated with the site including the history of the D03A/0750 application and D07A/1771 (refused) applications.
- What has changed from D07A/1771 application – The site is now in the ownership of Kennedy Wilson.

Vision for the site (Presentation by the Applicant / Architect)

The applicant seeks to complete the development at the Grange increasing the existing profile onto Brewery Road.

Proposal to focus on similar level of amenity at the Grange at present, concierge service, proposed amenity space to include a café space, gyms, meeting rooms connection to the central garden.

The applicant seeks to realign the existing access (and introduce landscaping) onto Brewery Road and create a better into the site when entering from Brewery Road.

Gate lodge off Brewery Road to demolished. The existing cottages to the front of the site are to be upgraded; the existing marketing suite on site will be demolished as part of the development.

Key points from Local Authority

- LmG notes the 5 previous reasons for refusal associated with D07A/1771.
- The description of the proposal is not a Built to Rent model, the applicant should outline how the current proposal is not Built to Rent, outlining how the Clancy Quay / Capital Dock rentals work.
- It is noted that there is a strong precedent for high density on the site and in the overall wider area. The existing Grange development has very much been designed around open space within the development.
- Topography of the site – there is a 6m level change between Brewery Road and the centre of the site is at a higher level.
- There are concerns that the scale of the development would have a negative impact on the existing 2 storey dwellings on Brewery Road.
- One cottage to the front of the site will remain in place, the applicant is aware that protecting the residential amenity of this dwelling should be considered as



- part of any development of the site. The applicant / architect highlights that there are significant distances from the proposed development to the cottage.
- In relation to Building N (9-10 stories), there is concern regarding the impact on the surrounding 2 storey dwellings. Although there has been a policy shift to encourage higher buildings, the applicant is advised to ensure that comprehensive shadowing surveys are undertaken as part of the submission.
 - Block H appears bulky – there is little detail of the building within the pre application submission. Some work may be need to reduce the overall bulk and scale of this building.
 - NF – is it likely that there is an opportunity to create a formal access to the park adjacent to the site.
 - MC – notes that the scheme is all apartment units and is there an opportunity for own door units at Brewery Road- adding some variety to the development.
 - Concern regarding the distances between Block H & G – approximately 17 metre distances, applicant to ensure that there are no overlooking concerns.
 - With regards to waste, the applicant outlines that the current arrangement for exiting residents is not great and this will improve greatly with the current proposal. This is welcomed by the LPA. The applicant is advised to contact Dermot O'Connor from DLR's Waste team.
 - There is some concern regarding the size of the overall covered amenity area, Kennedy Wilson, willing to explore this option and reduced the area covered in. Applicant notes that the usability of this area depends of the age profile residing in the development – this area is a safe play area for children.
 - Permeability – MC- raised concern regarding the lack of permeability through some parts of the site,(only access from N11 through the site on bike / wheelchair) and this could be addressed with platform lifts. This is something that DLR successfully negotiated on a recent scheme at Tivway in Sandyford. Similar site with level changes.
 - As part of the previous application, a nursing home formed part of the development, Suzanne McClure, to address the loss of this facility within the current proposal. Kennedy Wilson unlikely to provide a care facility at this time. Assisted living is suggested by the Council.
 - Concerns raised by Planners include, the impact of the development on existing residents. The applicant is advised to liaise with the Leopardstown residents Associations.
 - MC raises issue regarding the presence of a stream that comes down Brewery Road, may have impact form an ecology perspective.
 - The applicant is advised to submit Photomontages as part of the submission.
 - In terms of finishes, the existing finishes and overall deisgn has aged well, and the applicant is advised to use similar high end materials that would complement the existing palate of finishes.
 - Overall the development of the site is welcomed to complete The Grange, and generally the new focal point and landscaping proposals are welcomed.

Trees and Landscaping

- The character of the Grange is set around the trees and landscaping. There is concern that the existing trees are in poor condition. The applicant states that the primary focus is to preserve as many trees on the site.



- There have been meetings / discussions held with Aidan Ffrench and Dara Daly regarding the trees and landscaping on the site. (MCA to follow up with Aidan Ffrench / Tom Kane on this).
- LMcG raises concern regarding the care of the existing trees on the site (underground car parking), were there any conditions on the parent permission that may not have been complied with, that could have led to the deterioration of the trees on the site.
- Roof Gardens are not included in the open space areas provided by the applicant .

Transportation

- The proposal would be 153 car parking spaces short of the required DLR parking standards.
- 1 for 1 parking at this location with N11 & Luas would be acceptable, provided the applicant can make a robust case for a reduced parking provision.

Drainage


- Preliminary assessment submitted.
- Pre connection report send to Irish Water, applicant has not received a response to date.
- The attenuation arrangement should be separate to the existing development at The Grange (BE)

Other matters

- EIAR screening would be required, this would be determined by the Bord as part of the Strategic Housing Application process.
- Specific requirement to engage with the Councils Housing Department – Please contact Mr Aiden Conroy in the Council's Housing Department.
- The applicant would be required to submit a Construction Management Plan.
- Applicant is advised to ensure that the apartments meet the requirements of the latest Apartment Guidelines (2018).
- The applicant is advised to contact the Planning Authority with any new proposals.



Applicant Pre-Planning Notes (Available for Meeting 1 only)

| | |
|---|--|
|  Planning & Development Consultants | 63 York Road, Dun Laoghaire, Co. Dublin www.brockmcclure.ie 01 - 5593859 |
|---|--|

Pre-Planning Meeting with Dun Laoghaire Rathdown County Council

Meeting Date

18 December 2018

Meeting Time

10.30 am

Attendees - Design Team

Peter McKenna (PK) (Kennedy Wilson)
Conor Kinsella (CK) (OMP)
Suzanne McClure (SMcC) (Brock McClure)
Linda McEllin (LMcE) (Brock McClure)
Joe Gibbons (JG) (Waterman Moylan)
Axel Hens (AH) (Mitchell Associates)

Attendees - Dun Laoghaire Rathdown County Council

Louise McGauran (LMcG) - Senior Planner
Michelle Costello (MCo) - Senior Executive Planner
Naoimh Fleming (NF) - Executive Planner
Margeurite Cahill (MCa) - Area Planner
Bernard Egan (BE) - Drainage
Joanne Gallagher (JG) - Drainage
Tom Kane (TK) - Parks
Clare Casey (CC) - Transportation





Meeting Minutes and Actions

| Introductions | | Action |
|-------------------|---|---------------------------|
| 1. | Introduction and Welcome from Brock McClure | N/A |
| 2. | Introduction and Background from Kennedy Wilson | N/A |
| 3. | Introduction of Design Team Members and Dun Laoghaire Rathdown Attendees | N/A |
| Planning Comments | | |
| 1. | CK presented the scheme with the aid of the pre-planning booklet. | Noted |
| 2. | AH provided clarity on existing tree condition. | Noted |
| 3. | LMcG queried the poor condition of the trees on site and what happened with the parent permission and conditions requiring the protection of trees on site. For the current application the arborist report will need to clearly set out detailed measures for protection of any trees. | The Tree File / Mitchells |
| 4. | TK noted that all B category trees should be retained where possible and be shown as distinct from C category. | The Tree File / Mitchells |
| 5. | The overshadowing and overbearing nature of the proposal along Brewery Road should be considered in detail. Consider impact on adjoining and established levels of residential amenity. | OMP / BMC |
| 6. | LMcG queried the condition of The Grange Cottages and confirmed that there should be clarity on works to same going forward. Consider how any area not included within a current application will be treated and landscaped. | OMP / BMC |
| 7. | LMcG requested that any planning application demonstrate that there is sufficient open space and communal open space for the overall masterplan lands (phase 1 and 2). Accessibility to Open Space should be a clear objective in the design. | OMP / BMC |
| 8. | AH confirmed meeting with Aiden French on site 19 December 2018. Update of meeting to follow. | Mitchells |
| 9. | MCo requested that consideration be given to an appropriate mix of unit types. Include variety where possible. Own door units are welcomed, particularly to give animation to Brewery Rd. Consider assisted living and housing for the elderly. 10% Part V requirement does not apply to these units. | OMP / KW |
| 10. | Any impact between Blocks H and G should be considered further. | OMP |
| 11. | Design Team confirmed that all journeys would be traced and analysed (by car, pedestrian and cyclist). | OMP/ Waterman Moylan |
| 12. | MCo noted that permeability between Brewery Road and the development proposal was key. Accessibility for all to be considered here. Current proposals do not deliver on access for wheelchairs, buggys etc. MCo suggested lifts as used in the Tivway Sandyford Scheme. | OMP |
| 13. | The connection to the adjoining park is critical. Design Team to seek clarity on whether or not this is TIC. NF suggested that the design team consider a tree lined link to park area to the west. | OMP / BMC |
| 14. | Design Team confirmed that the current proposal will incorporate a revised Waste Management system. Compactors will be used. LMcG requested that the design team meet with the waste management section in DLR. | Waste Consultant |



| | | |
|--|---|---------------------------|
| 15. | Discussion on the nature and design of the central open space area. LMcG requested that the design team consider reducing the extent of the built amenity space. NF requested that the design team consider any impact on overshadowing of the open space area. | OMP |
| 16. | NF queried if there were alternative arrangements for a second access to basement. Design Team confirmed that this was not possible. | N/A |
| 17. | The inclusion of green roof space in public open space calculations was queried. Design Team confirmed that green roof space was additional to open space calculations. | N/A |
| 18. | LMcG queried crèche facility capacity and if this can cater for the overall development. Design Team to review. | OMP / BMC |
| 19. | The existing number of units and proposals for new units should be clearly detailed in the application. | OMP / BMC |
| Roads | | |
| 1. | Ideally a ratio of 1:1 is required for car parking. | Noted |
| 2. | Design Team set out the case for a reduced car parking standard. Operationally 50% of KW schemes do not use cars. It was confirmed that car spaces can be rented to tenants, but this is normally declined. | Waterman Moylan |
| 3. | Accepted generally that a reduced car parking rate was appropriate at this site. No ratio agreed. Any deviation will need to be supported. | Waterman Moylan |
| 4. | The use of Go Car was identified by the team. DLR requested that detail be submitted with the application. Usability of the Go Car system should be examined. | Waterman Moylan |
| Drainage | | |
| 1. | Concern raised over the appearance of open space areas as 'green' but these are hard standing when considered in detail. | Noted |
| 2. | Noted that there was significant hard standing areas. There needs to be more permeable paving and a reduction in hard paving and raised areas. | Waterman Moylan/Mitchells |
| 3. | Additional Detail required for DLR to comment appropriately. | Waterman Moylan |
| 4. | MCo queried the nature of the rain gardens along Brewery Road. Application should contain clear detail on how these work. | OMP |
| Concluding Comments from Planning | | |
| 1. | Existing Mix Breakdown and Overall Mix proposed to be detailed in any application. | OMP |
| 2. | Part V proposals should be delivered. Contact Housing (Aiden Conroy) on proposals. | OMP/ BMC |
| 3. | Requirement for EIAR should be considered. BMC confirmed that a screening statement will be prepared. | BMC |
| 4. | Clear detail required on the overall masterplan for the lands. The cumulative development must be considered and specifically in relation to public open space calculations. | OMP/BMC |
| 5. | The density was identified as high. | Noted |
| 6. | Block H is a dominant block within the scheme and consideration to be given to final design here. Avoid monolithic appearance. | OMP |



| | | |
|-----|--|-----------------------|
| 7. | The impact on residents during construction should be considered in detail. A Construction Management Plan is required. | Waterman Moylan |
| 8. | Ecological considerations and presence of a stream along Brewery Road should be considered. BMC confirmed that initial survey work has been completed. | Scott Cawley |
| 9. | DLR recommended that there should be some form of PR engagement with local residents and the tennis club etc. | Kennedy Wilson |
| 10. | Permeability of the development is key. Accessibility Audits, Sections and Photomontages are required. | OMP / Waterman Moylan |
| 11. | Materials should move away from the 'warm' colour palette and look at something new that will integrate into the surrounding area. | OMP |
| 12. | Consider microclimate and include detail in an application. | OMP |
| 13. | Consider cycle parking requirements and how the inclusion of the DLR bicycle scheme would work. | Waterman Moylan |

Linda McEllin
Brock McClure Consultants
19 December 2018



Correspondence with Parks

MITCHELL + ASSOCIATES

Landscape Architecture Urban Design

www.mitchellassoc.net

our ref: LGRA032 2018 12 19 – File Note

FILE NOTE

Re: Site Meeting with DLRD Co Co on the 19th December 2018 re Tree retention

Attendees: Aidan French (AF) & Tom Kane (DD) - DLRD Co. Co. Parks department
Andy Worsnop – The Tree File

Time: 11:30

Venue: The Grange Site

The Grange phase 1:

A meeting was arranged with DLRD Co Co to discuss the retention of trees on the site and to review their current condition and long-term value and sustainability.

- The tree belt to the back of the gate lodge and along the park boundary was discussed. In the current and future context this groups of trees were considered not to have a long-term value and replacement planting should be considered and welcomed. The evergreen tree belt along the park boundary although wind swept was considered to give a good backdrop to the park and therefore was more sensitive for removal, proposals would need to be explored to justify its removal to the Parks department.
- The removal of the existing tree belt in its entirety along the fire tender route was discussed and agreed that substitute planting would be a better long-term solution.
- It was agreed that the walnut trees should not be retained due their current condition and these could be removed and substitute tree planting put in place to create a new sustainable tree belt.
- The smaller, newly and more recently planted trees on the site were briefly discussed and any trees affected by the development would be a straight replacement or substituted somewhere else on site, no issues were raised regarding their removal where required.

General Note:

The meeting went very well and Aidan French was overall concurring with our findings and approach in relation to the removal of the main existing tree belts within the site, providing substitute tree planting would be proposed.

Aidan French suggested a further meeting in the early New year to discuss next steps and approach of the substitute tree planting.

Unit 5 Woodpark The Rise Glasnevin Dublin 9 D09 NA02 Ireland
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VAT No.: IE 1114098RH

Mitchell Landscape Architecture Ltd Company no: 523027 Registered address: 5 Woodpark The Rise Glasnevin Directors: Brian McGuinne Dave Kirkwood



FILE NOTE

Meeting with DLRD Parks department re tree replacement at The Grange

Date: 31st of January 2019 at 12noon

Venue: DLRD Co. Co. office at Dun Laoghaire

Attendees:

Aidan French (AF) DLRD parks department – Executive Parks Superintendent

Tom Kane (TK) DLRD Parks department

Andy Worsnop (AW) The Treefile - Arborist

Axel Hens (AH) Mitchell + Associates – Landscape Architect

Re: Tree removal and tree replacement proposals. Boundary treatment with existing park.

The following areas and trees where discussed:

- Walnut trees and area along East of block M
- Tree planting along existing fire tender route South of block M
- Deciduous Tree group to the East of the gate lodge at the entrance off Brewery road including the boundary trees (evergreen Lawson cypress) with the Public park to the South of the gate lodge.

The tree survey plan was presented by AH and AW to Aidan French and Tom Kane showing the 3 main locations where we propose to remove the trees due their current condition and replace with new trees and woodland mix.

The below points were discussed:

Walnut trees area along the East of Block M – We agreed with AF and TK we can remove the existing walnut trees on the basis of their current condition and long-term arboriculture value and replace with new trees.

Fire route area – We agreed with AF and TK that we can remove the existing group of trees along the crib wall embankment due to their current condition and replace with new tree planting.

Entrance area at the gate lodge: We agreed that the group of deciduous trees could be replaced with new tree planting and woodland mix.

Evergreen Boundary trees along boundary with existing park: AF seemed amenable for removing the existing trees along the boundary and replacing them with new trees and hedge planting to create a new and more bio-diverse long-term boundary. Tom Kane was not in favour for the removal of the evergreen trees and would like the trees to remain in place. AW explained the current Health and Safety issues the Same type of trees are posing along the boundary with the Tennis Club in relation to wind damage and that removal of the trees would be recommended considering the trees new context and location at the main entrance. We discussed a possible solution and AH from M+A will prepare a planting and tree schedule for their consideration.



From: ffrench Aidan <affrench@DLRCOCO.IE>
Sent: 02 April 2019 10:09
To: Axel Hens <axel.hens@mitchellassoc.net>
Cc: Kane Tom <tkane@DLRCOCO.IE>
Subject: LGRA032 AF 2019 02 19 - The Grange - draft - tree replacement proposal

Dear Axel,

My sincere apologies for the delay in getting back to you: it's been hectic here!

My only comments relate to the draft Planting Schedule in your Boundary Treatment - Tree Replacement Proposal (dwg no. 200), All the proposed planting (hedge plants and tree planting) is acceptable. But it isn't sufficiently biodiverse and visually diverse. Therefore, I'd be obliged if you'd add the following species:-

Hedge Plants - native Irish

1. *Corylus avellana* (Hazel)
2. *Euonymus europaeus* (Spindle)
3. *Ilex aquifolium* (Holly)
4. *Lonicera periclymenum* (Common Honeysuckle)
5. *Rosa canina* (Dog Rose)

Tree Planting

1. *Pinus sylvestris* (Scots Pine) - it's localised in Stillorgan
2. *Larix decidua* (European Larch)

Trust this is agreeable?

Kind Regards,

Aidan J. ffrench

Aidan J. ffrench MILI Dip Applied PM

PM | Blue-Green Infrastructure

Executive Landscape Officer
Dlr Parks & Landscape Services
Dún Laoghaire-Rathdown County Council
County Hall, Marine Road, Dún Laoghaire,
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em | aidan.ffrench@dlrcoco.ie

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From: ffrench Aidan
Sent: 21 February 2019 11:43
To: Axel Hens <axel.hens@mitchellassoc.net>
Cc: Andy Worsnop (<thetreefile@eircom.net> <thetreefile@eircom.net>); Kane Tom <tkane@DLRCOCO.IE>
Subject: RE: LGRA032 AF 2019 02 19 - The Grange - draft - tree replacement proposal

Thanks very much Axel,

I'll review the proposals with Tom Kane, and we'll come back to you with comments next week.

Kind Regards,

Aidan

Aidan J. ffrench MILI Dip Applied PM

PM | Blue-Green Infrastructure

Executive Parks Super.
Dlr Parks & Landscape Services
Dún Laoghaire-Rathdown County Council
County Hall, Marine Road, Dún Laoghaire,
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From: Axel Hens [<mailto:axel.hens@mitchellassoc.net>]
Sent: 19 February 2019 16:04
To: ffrench Aidan <affrench@DLRCOCO.IE>; Kane Tom <tkane@DLRCOCO.IE>
Cc: Andy Worsnop <thetreefile@eircom.net>
Subject: LGRA032 AF 2019 02 19 - The Grange - draft - tree replacement proposal

Dear Aidan and Tom,

Further to our meeting held in DLRD Co. offices on the 31st of January, we attach for your consideration and comments -

our Draft Proposals for the Replacement Tree Planting that we discussed at our meeting, and additional proposals for

the Tree and Hedge Replacement along the existing Park boundary.

If you have any comments re the attached or would like to discuss further please do not hesitate to contact me.

Regards

Axel Hens
Associate

MITCHELL + ASSOCIATES

Landscape Architecture Urban Design

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Mitchell Landscape Architecture Ltd Company number: 523027
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Directors: Brian McGuinne Dave Kirkwood VAT No. IE 1114098RH

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Correspondence with Housing

1. BMC notes From Meeting Held 9 July 2019: -

- DLR preference in BTR schemes is for acquisition of units off site.
- It was accepted that the proposal submitted to ABP will be for lease, with separate discussions post grant if purchase off site is feasible for KW.
- Studio units are not favoured but would be accepted in the BTR Lease proposal.
- DLR may look to lease more units in Block N (e.g. entire block).
- In BTR on site DLR look for an Enhanced Long Term Lease (25 years, no option to acquire, no option to extend lease).
- Landlord is responsible for management fees and repairs.

2. Correspondence from Housing Department of DLR

From: Conroy Aiden aidenconroy@DLRCOCO.IE

Date: Thursday 4 July 2019 at 15:02

To: Suzanne McClure suzanne@brockmclure.ie

Subject: Part V The Grange, Stillorgan

Dear Suzanne,

I refer to our earlier meeting and note that this is now a BTR proposal and to comprise of 287 units.

As such, the original proposal for compliance with Part V, namely on-site acquisition for social housing, is now unsuitable.

Acquisition remains the Council's preferred option so as to secure the asset and, as on-site cannot be achieved in the context of a BTR development, off-site acquisition would become the default. However, it is acknowledged that securing up to 29 units off-site presents challenges unless, of course, your client has access to such stock and can put a proposal forward for consideration. Perhaps this might be clarified.

We had discussed the on-site lease option and I provided a brief outline of general terms viz:

- The model currently adopted is the Enhanced Long-Term lease and is for a term of 25 years
- Rent levels are at 95% of agreed market rents subject to three-yearly reviews and linked to Harmonised Index of Consumer Prices (HICP)
- Rents are further discounted by the value of the Nett Equivalent Monetary Value (EMV) and is either 'front-loaded' or paid over the lease term in which case it is subject to a Nett Present Value (NPR) discount
- Owner/landlord is responsible for all maintenance/repairs (within the apartment as well as common areas/structural), management services and charges as well as insurances
- DLRC is responsible for managing the (sub) tenancy i.e. the social tenant

I have attached the draft/template Agreement for Lease and Lease for your information and confirm that I have a meeting arranged with my Director to consider the viability/acceptability of the on-site lease option in respect of this proposed development and will revert.

Finally, I had referred to our preference for one-bedroomed units over studio units and also to the possibility, in the context of a lease option, of securing more than 10% as in the case of the 40 unit Block N or 58 unit Block J (more attractive with lower number of studios as well as additional 18 units) - these figures being based on the previous plans.



Kind regards,

Aiden

Aiden Conroy

Housing Department

Part V/Acquisitions/Loans

Tel: 01-2054700 Ext. 4121

Direct: 01-2047936

Email: aidenconroy@dlrcoco.ie

